

EXHIBIT II

to Cisneros Declaration ISO Plaintiffs'
Supplemental Motion for Class Cert
[ECF No. 418-2]

PUBLIC/REDACTED VERSION

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN JOSE DIVISION
4

5 IN RE: HIGH-TECH EMPLOYEE)
6 ANTITRUST LITIGATION)
7) No. 11-CV-2509-LHK
8 THIS DOCUMENT RELATES TO:)
9 ALL ACTIONS.)
10 _____)
11

12 VIDEOTAPED DEPOSITION OF MASON STUBBLEFIELD
13 ATTORNEYS' EYES ONLY
14 Friday, March 29, 2013
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24 Reported By:
25 KATHLEEN WILKINS, CSR #10068, RPR-RMR-CRR-CCRR-CLR

10:22:47 1 that same area, did your duties change?

10:22:51 2 A. Duties didn't change as much, again, as
10:22:53 3 much as the expectations of me as an individual
10:22:55 4 changed, but the basic scope of responsibility was
10:22:58 5 still fairly similar.

10:23:01 6 Q. And how about now as VP of rewards?

10:23:04 7 A. The transitioning back from an HR
10:23:07 8 business partner role into the rewards role, the
10:23:10 9 scope of the job is different, the role is
10:23:11 10 different. So I now have responsibility for
10:23:14 11 everything end to end in compensation and benefits
10:23:16 12 for the company.

10:23:27 13 Q. And when you were starting at the
10:23:29 14 company, did you report to Mr. Grenier?

10:23:34 15 A. Yes, I did. When I first started, I
10:23:35 16 reported to Jim Grenier.

10:23:38 17 Q. At some point along the way, did that
10:23:40 18 change?

10:23:40 19 A. It did. When I moved to the HR business
10:23:43 20 partner role, I moved from reporting to him to
10:23:45 21 reporting to someone else.

10:23:48 22 Q. And to whom did you report then?

10:23:50 23 A. Jennifer Hall.

10:23:58 24 Q. And did you continue to report to
10:23:59 25 Ms. Hall when you became a vice president?

10:24:02 1 A. No. Actually, prior to that point, the
10:24:04 2 roles that I had shifted some, and I started to
10:24:08 3 report to Sherry Whiteley.

10:24:16 4 Q. And did you report to Ms. Whiteley until
10:24:19 5 you went back to the VP rewards job?

10:24:22 6 A. I still report to her today.

10:24:24 7 Q. Okay.

10:24:24 8 A. So since 2009 I've reported directly to
10:24:27 9 her.

10:24:43 10 Q. When your job changed a bit in the first
10:24:46 11 year and you took on more responsibility,
10:24:48 12 including base compensation, bonus, et cetera,
10:24:53 13 tell me what was involved in -- start with the
10:24:56 14 base compensation work.

10:24:59 15 A. So I'd say it's fairly broad from a base
10:25:02 16 compensation perspective. It's something we think
10:25:04 17 of as job architecture. So the job codes that we
10:25:07 18 use, the job titles that we use, the structure
10:25:09 19 behind that job system that we have really around
10:25:12 20 job codes, job families. And so helping structure
10:25:15 21 that, set that up. The connections from that into
10:25:18 22 the market data and how we provide market
10:25:20 23 reference data to the organization to assist with
10:25:22 24 making compensation decisions; the extension of
10:25:26 25 that into the annual talent and pay process, the

10:25:29 1 merit decisions, performance decisions and
10:25:33 2 managing that process across the company.

10:25:35 3 It included a broader scope around the
10:25:38 4 company-wide bonus program that we call IPI. The
10:25:42 5 forecasting, the management of that process and
10:25:44 6 the decision process we're at each year. More
10:25:48 7 responsibility around our year-end process with
10:25:51 8 the things we think of as the annual focal process
10:25:53 9 or the talent and pay review. So supporting that
10:25:56 10 process and how it rolls up at a company level.
10:26:04 11 And at some point along the way I did take on
10:26:07 12 responsibility for the retirement program, the
10:26:08 13 401(k) program.

10:26:17 14 Q. What was involved in the job
10:26:19 15 architecture work?

10:26:21 16 A. It's basically setting up some structure
10:26:24 17 behind job codes and job families, job levels that
10:26:28 18 we use to identify the roles that exist across the
10:26:31 19 organization, helping -- it's a tool that helps
10:26:35 20 leaders with the different -- kind of different
10:26:37 21 levels or different roles that exist inside of
10:26:39 22 their teams and how we can take those and connect
10:26:41 23 them out to the marketplace in roles that exist.
10:26:44 24 It helps with job expectations a little bit from a
10:26:47 25 performance management perspective and the core

10:26:49 1 things that would be expected in a job.

10:26:53 2 Q. And what was your understanding of why
10:26:55 3 you were doing that work at that time?

10:26:57 4 A. A necessary infrastructure to run a
10:27:01 5 business.

10:27:04 6 Q. Was one of the goals of creating job
10:27:07 7 codes and job families to ensure that people with
10:27:11 8 similar competencies got slotted into the right
10:27:14 9 levels?

10:27:17 10 A. From a leveling perspective, I'd say yes
10:27:19 11 in that we were building to some things that got
10:27:23 12 to consistency in how we level jobs relative to
10:27:26 13 the marketplace, and some consistency of levels
10:27:28 14 that we use across the organization from a job
10:27:31 15 scope perspective.

10:27:35 16 Q. Did that job architecture work that was
10:27:38 17 part of your base compensation duty change during
10:27:43 18 the time that you were working in the total
10:27:48 19 rewards area prior to the present?

10:27:52 20 A. Not significantly, no.

10:28:01 21 Q. And you mentioned that part of what you
10:28:02 22 were doing in creating these job codes and job
10:28:05 23 families was also connecting that to market data.

10:28:08 24 Can you explain what that was about?

10:28:10 25 A. Yes. We use market reference data as

10:28:13 1 one of the tools to help aid decisions around how
10:28:19 2 we compensate employees. So part of what we were
10:28:20 3 doing was putting levels in place that were
10:28:22 4 consistent or connected, not necessarily
10:28:25 5 completely consistent, but connected to levels
10:28:28 6 that are used in some of the surveys that exist in
10:28:31 7 the marketplace as a way for us to collect market
10:28:33 8 information on how other companies pay similar
10:28:35 9 types of roles, similar levels of roles.

10:28:38 10 Q. And do you recall in the 2005 era what
10:28:41 11 types of market survey information you were
10:28:43 12 collecting?

10:28:44 13 A. The pri- -- the primary survey that we
10:28:47 14 use is through Radford, and that's been the one
10:28:50 15 that we've used historically.

10:28:53 16 Q. And what type of information do you get
10:28:55 17 from Radford?

10:28:58 18 A. [REDACTED]
10:28:59 19 [REDACTED]
10:29:02 20 [REDACTED]
10:29:05 21 [REDACTED]
10:29:09 22 [REDACTED]
10:29:11 23 [REDACTED]
10:29:14 24 [REDACTED]
10:29:16 25 [REDACTED]

10:29:19 1 Q. And is there a certain set of Radford
10:29:25 2 data that is particularly of interest to Intuit,
10:29:27 3 either by industry or type of worker?

10:29:31 4 A. So historically, we've looked just at
10:29:34 5 the general survey data from Radford. And so
10:29:37 6 we've not done selected market cuts or pulled
10:29:39 7 specific companies out of the data; we just look
10:29:41 8 at their general data. [REDACTED]

10:29:44 9 [REDACTED]
10:29:46 10 [REDACTED]
10:29:48 11 [REDACTED]
10:29:50 12 So we'll use that as a piece of data to help us in
10:29:53 13 making decisions or references for decisions in
10:29:56 14 other locations. But we don't use a select
10:29:59 15 company cut.

10:30:00 16 Q. [REDACTED]
10:30:02 17 [REDACTED]
10:30:04 18 [REDACTED]

10:30:08 19 A. [REDACTED]
10:30:10 20 [REDACTED] [REDACTED]
10:30:12 21 [REDACTED]
10:30:14 22 [REDACTED] [REDACTED]
10:30:16 23 [REDACTED]
10:30:19 24 [REDACTED] [REDACTED]
10:30:21 25 [REDACTED]

10:30:25 1

[REDACTED]

10:30:27 2

Q. Okay. Do you have a sense of what

10:30:32 3

the -- the key jobs are for you to get market data on?

10:30:37 4

10:30:39 5

A. We tried to benchmark every job that we

10:30:42 6

can, and so we're able to benchmark about

10:30:45 7

80 percent of our jobs today. So I'm not sure I

10:30:47 8

would describe it as key jobs as much as it is

10:30:50 9

having representative data that helps us in making

10:30:53 10

decisions across the broad organization.

10:30:58 11

Q. And why do you try to benchmark these

10:30:59 12

jobs to the market?

10:31:02 13

A. Be able to pay competitively.

10:31:12 14

Q. Is there a process by which you or

10:31:15 15

others that you were aware of in the organization

10:31:17 16

in that 2005/2009 time period would review market

10:31:23 17

data to determine whether there should be salary

10:31:26 18

adjustments because the market was changing for

10:31:28 19

certain jobs?

10:31:29 20

A. Sure. We would look at the data as a --

10:31:32 21

you know, as one reference point for us in knowing

10:31:35 22

how fast the market is moving and how much things

10:31:37 23

are changing in the market and use that as an

10:31:40 24

indication of what -- a piece of data or something

10:31:42 25

that may help us in determining what our merit

10:31:45 1 budgets should be or if we needed to make
10:31:47 2 additional adjustments.

10:31:48 3 Q. And would you do that ever at looking at
10:31:50 4 specific jobs as opposed to overall merit
10:31:55 5 increases the companies were doing?

10:31:57 6 A. I'd say yes, we would look at both. So
10:31:59 7 we would look to see if things were moving faster
10:32:01 8 in any specific space than others just so we were
10:32:05 9 aware of what was happening to see if it might
10:32:08 10 cause us to want -- prompt a need to do something
10:32:10 11 different with a budget for some part of the
10:32:13 12 organization.

10:32:13 13 Q. [REDACTED]

10:32:15 14 [REDACTED]

10:32:16 15 A. [REDACTED]

10:32:20 16 [REDACTED]

10:32:23 17 [REDACTED]

10:32:25 18 [REDACTED]

10:32:28 19 Q. And tell me about that review process.
10:32:29 20 Put a time period on it. Let's say 2005 or 2006,
10:32:38 21 who would have been involved in doing that type of
10:32:41 22 review looking at market data and determining
10:32:42 23 whether there should be some changes in Intuit's
10:32:45 24 compensation?

10:32:47 25 A. It would have been myself as well as

10:32:49 1 some others as members of the compensation team.

10:32:55 2 Q. And in the 2005 period, who was part of
10:32:58 3 that compensation team doing that type of review?

10:33:01 4 A. If I go back to 2005, it was primarily
10:33:03 5 myself doing that type of review and a gentleman
10:33:05 6 named Paul Reichow.

10:33:10 7 Q. And did that -- did the composition of
10:33:13 8 that team change over time?

10:33:15 9 A. Yes.

10:33:15 10 Q. And how did it change?

10:33:16 11 A. Paul left the organization at some
10:33:19 12 point. Actually, if I think back too, there was
10:33:23 13 one other person called Deborah Morley who was
10:33:27 14 involved in some of the work then. People moved
10:33:29 15 into different roles and changed responsibilities,
10:33:31 16 changed roles. We brought other people into the
10:33:34 17 team. And so over a period of years, the team
10:33:36 18 would have evolved in some way.

10:33:37 19 Q. And going that forward to '06, '07, '08,
10:33:40 20 did the team grow or were there additional people
10:33:43 21 added?

10:33:44 22 A. Additional people, different people in
10:33:45 23 the team.

10:33:46 24 Q. Do you remember some names from that
10:33:47 25 era?

10:33:48 1 A. Sure.

10:33:52 2 Think a second. So I don't remember the
10:34:00 3 exact years on all of the time frames. So
10:34:03 4 there's -- one person who came into the team and
10:34:06 5 had some involvement in this was Melissa Sheffer,
10:34:09 6 and Carmen Mendez. There's one other one. It's
10:34:22 7 terrible. I'm remembering the first name but not
10:34:25 8 remembering the last name.

10:34:25 9 Q. What's the first name?

10:34:27 10 A. It's been awhile back. Patty.
10:34:28 11 Patricia. I don't remember the last name.

10:34:31 12 Q. It's completely natural that that
10:34:32 13 happens. And if you remember something later on
10:34:34 14 in the day to clear up a question that was hard to
10:34:36 15 answer earlier, it's fine to say "I now remember."

10:34:40 16 A. I'm sure I will think about it until I
10:34:42 17 remember it then.

10:34:43 18 Q. No problem.

10:34:44 19 During the time period that you were
10:34:46 20 actively involved in reviewing market data and
10:34:49 21 considering whether that should influence changes
10:34:50 22 in Intuit's compensation, was that the 2005/2008
10:34:57 23 period?

10:35:01 24 A. If I understand your question, I think
10:35:01 25 yes.

10:35:04 1 Q. Let me back up. Asked a poor question.

10:35:06 2 So there was a period of time when you
10:35:07 3 were involved in the compensation group that was
10:35:09 4 looking at market data and determining whether, on
10:35:12 5 a company basis or for a certain positions, there
10:35:16 6 should be a change in the compensation?

10:35:17 7 MR. KIERNAN: Hang on. Object to form.

10:35:20 8 BY MS. DERMODY:

10:35:20 9 Q. Is that correct?

10:35:22 10 A. So I --

10:35:22 11 MR. KIERNAN: Object to form. Just so I
10:35:24 12 can get -- there were two questions, so let me get
10:35:26 13 it --

10:35:27 14 MS. DERMODY: Sure.

10:35:28 15 MR. KIERNAN: Yeah.

10:35:28 16 THE WITNESS: Okay. So if I understand
10:35:31 17 your question, so during that time period, I had
10:35:34 18 responsibility for making a recommendation on what
10:35:37 19 the company's merit budget was. [REDACTED]

10:35:42 20 [REDACTED] [REDACTED]

10:35:44 21 [REDACTED] [REDACTED]

10:35:47 22 [REDACTED]

10:35:50 23 [REDACTED]

10:35:52 24 [REDACTED]

10:35:54 25 [REDACTED]

10:35:56 1 [REDACTED]
10:35:58 2 [REDACTED]
10:36:00 3 BY MS. DERMODY:
10:36:01 4 Q. Okay. And if you determined that you
10:36:01 5 weren't competitive in the market, would that
10:36:04 6 influence a decision to increase salaries in a
10:36:05 7 certain area?

10:36:07 8 MR. KIERNAN: Object to form.

10:36:09 9 THE WITNESS: [REDACTED]
10:36:13 10 [REDACTED]
10:36:15 11 [REDACTED] In most
10:36:17 12 years it was 3 to 4 percent. [REDACTED]

10:36:20 13 [REDACTED]
10:36:23 14 [REDACTED]
10:36:25 15 [REDACTED] [REDACTED]
10:36:28 16 [REDACTED]
10:36:29 17 [REDACTED]
10:36:32 18 [REDACTED]
10:36:34 19 [REDACTED]
10:36:35 20 [REDACTED] [REDACTED]
10:36:37 21 [REDACTED]
10:36:37 22 [REDACTED]
10:36:41 23 [REDACTED]
10:36:44 24 [REDACTED]
10:36:46 25 BY MS. DERMODY:

10:36:46 1 Q. [REDACTED]

10:36:47 2 [REDACTED]

10:36:50 3 [REDACTED] [REDACTED]

10:36:51 4 A. [REDACTED] [REDACTED]

10:36:53 5 [REDACTED]

10:36:54 6 Q. Right.

10:36:55 7 [REDACTED]

10:36:56 8 [REDACTED]

10:36:59 9 [REDACTED]

10:37:01 10 [REDACTED]

10:37:03 11 [REDACTED]

10:37:05 12 [REDACTED]

10:37:06 13 MR. KIERNAN: Object to form.

10:37:10 14 THE WITNESS: [REDACTED]

10:37:11 15 [REDACTED] --

10:37:13 16 [REDACTED] [REDACTED]

10:37:17 17 [REDACTED]

10:37:19 18 [REDACTED]

10:37:22 19 [REDACTED]

10:37:22 20 BY MS. DERMODY:

10:37:22 21 Q. [REDACTED]

10:37:24 22 [REDACTED]

10:37:26 23 [REDACTED]

10:37:29 24 MR. KIERNAN: Object to form.

10:37:32 25 THE WITNESS: The --

10:37:34 1 MR. KIERNAN: Just so I can clarify, the
10:37:35 2 reason I keep saying that is I don't know when
10:37:37 3 you're saying "you" if you mean he personally or
10:37:40 4 Intuit in general.

10:37:41 5 MS. DERMODY: Sure. Fair enough.

10:37:43 6 Q. I'm asking you in your role on this
10:37:46 7 compensation group.

10:37:50 8 A. We use the data as a reference tool. We
10:37:53 9 used other elements of data as reference tools as
10:37:55 10 well. [REDACTED]

10:37:59 11 [REDACTED]

10:38:01 12 [REDACTED]

10:38:04 13 [REDACTED]

10:38:04 14 [REDACTED]

10:38:06 15 [REDACTED]

10:38:08 16 [REDACTED] [REDACTED]

10:38:11 17 [REDACTED] [REDACTED]

10:38:13 18 [REDACTED] [REDACTED]

10:38:16 19 [REDACTED] [REDACTED]

10:38:18 20 [REDACTED]

10:38:21 21 [REDACTED]

10:38:24 22 [REDACTED]

10:38:25 23 [REDACTED]

10:38:28 24 [REDACTED] [REDACTED]

10:38:30 25 [REDACTED]

10:38:31 1

10:38:34 2

10:38:41 3

10:38:46 4

10:38:49 5

10:38:52 6

10:38:56 7

10:38:58 8

10:39:01 9

10:39:02 10

10:39:04 11

10:39:07 12

10:39:13 13

10:39:13 14

10:39:18 15

10:39:22 16

10:39:28 17

10:39:30 18

10:39:35 19

10:39:37 20

10:39:39 21

10:39:41 22

10:39:43 23

10:39:46 24

10:39:49 25

[REDACTED]

Q. When you moved to the HR business partner role, was there another group of people that were continuing to use the market data and perform the same tasks you were then performing?

A. Yes. The -- there were others who took on -- there was others who took on the roles and responsibilities that I had when I moved.

Q. And who were those people?

A. The role was essentially split between two people. Parrish Pullen.

Q. And?

A. And Christina Hall. And I did remember the last name of the other person. Patricia Kada, K-A-D-A.

Q. Thank you.

What were Mr. Pullen and Miss Hall's responsibilities?

A. Miss Hall took on most of the responsibilities that I had had in executive compensation and equity compensation, and Mr. Pullen took on more of the base pay responsibilities that I had had initially. And that evolved some over time. And I don't know

10:39:51 1 that I can tell you everything about how it
10:39:54 2 evolved.

10:39:55 3 Q. Okay. When you moved into the HR
10:40:15 4 business partner role, you mentioned that you had
10:40:17 5 some responsibility for compensation decisions
10:40:20 6 that were on your team.

10:40:22 7 What was that responsibility?

10:40:24 8 A. So as the HR leader for the business
10:40:26 9 unit, I worked closely with the head of the
10:40:29 10 business unit in our annual focal process in
10:40:31 11 auditing decisions that had been made across the
10:40:34 12 organization to ensure that we were paying for
10:40:35 13 performance.

10:40:44 14 Q. And can you describe what that audit
10:40:47 15 process was?

10:40:47 16 A. [REDACTED]

10:40:50 17 [REDACTED]

10:40:52 18 [REDACTED]

10:40:55 19 [REDACTED]

10:40:57 20 [REDACTED]

10:40:59 21 [REDACTED]

10:41:02 22 [REDACTED]

10:41:04 23 [REDACTED]

10:41:07 24 [REDACTED]

10:41:10 25 Q. And please describe kind of what the

10:41:17 1 actual steps were along the way of the whole
10:41:21 2 audit.

10:41:23 3 A. [REDACTED]

10:41:25 4 [REDACTED]

10:41:28 5 [REDACTED]

10:41:30 6 [REDACTED]

10:41:32 7 [REDACTED]

10:41:33 8 [REDACTED]

10:41:35 9 [REDACTED]

10:41:38 10 [REDACTED]

10:41:41 11 [REDACTED]

10:41:44 12 [REDACTED]

10:41:47 13 [REDACTED]

10:41:50 14 [REDACTED]

10:41:52 15 [REDACTED]

10:41:55 16 [REDACTED]

10:41:57 17 Looking at data across the different
10:41:59 18 leaders below the senior leader to make sure we
10:42:02 19 had consistency and compliance to budget at an
10:42:04 20 overall level. [REDACTED]

10:42:07 21 [REDACTED]

10:42:10 22 [REDACTED]

10:42:11 23 Q. [REDACTED]

10:42:12 24 [REDACTED]

10:42:19 25 [REDACTED]

10:42:22 1

[REDACTED]

10:42:27 2

[REDACTED]

10:42:32 3

A. [REDACTED]

10:42:34 4

[REDACTED]

10:42:37 5

[REDACTED]

10:42:39 6

[REDACTED]

10:42:42 7

[REDACTED]

10:42:44 8

Q. [REDACTED]

10:42:46 9

[REDACTED]

10:42:49 10

A. [REDACTED]

10:42:53 11

[REDACTED]

10:42:55 12

[REDACTED]

10:42:58 13

[REDACTED]

10:42:58 14

Q. Okay. Were there certain things that

10:43:01 15

would show up or would catch your eye as eye

10:43:05 16

opening in a recommendation?

10:43:06 17

A. Sure.

10:43:08 18

Q. What would that be?

10:43:10 19

A. A pay increase that was outside a

10:43:12 20

guideline for the performance rating, perform a --

10:43:15 21

any -- any inconsistencies. We have a set of

10:43:19 22

guidelines and we would have exception reporting

10:43:21 23

to identify things that were outside of those

10:43:24 24

guidelines and would audit those.

10:43:26 25

Q. So if -- so were there ranges of merit

10:43:32 1 increase that would be appropriate for different
10:43:34 2 performance ratings?

10:43:34 3 MR. KIERNAN: Object to form. Sorry.
10:43:38 4 Object to form.

10:43:40 5 THE WITNESS: We provide guidelines.
10:43:40 6 Intuit provides guidelines for what we would
10:43:44 7 expect a range of increase to be for a level of
10:43:46 8 performance.

10:43:47 9 BY MS. DERMODY:

10:43:47 10 Q. And then if a person -- if a manager had
10:43:50 11 recommended someone outside that guideline, would
10:43:53 12 that be something that you would audit?

10:43:55 13 A. Would depend on how far outside the
10:43:57 14 guideline it was. But likely it would be
10:43:59 15 something we'd look at to try to understand why
10:44:01 16 the recommendation was being made.

10:44:03 17 Q. Okay. And you mentioned that you were
10:44:06 18 involved in the audit process.

10:44:08 19 Was someone else also involved with you
10:44:11 20 reviewing the managers in your area?

10:44:14 21 A. [REDACTED]

10:44:16 22 [REDACTED]

10:44:19 23 [REDACTED]

10:44:22 24 [REDACTED]

10:44:25 25 [REDACTED]

10:44:28 1

[REDACTED]

10:44:29 2

Q.

[REDACTED]

10:44:31 3

[REDACTED]

10:44:33 4

[REDACTED]

10:44:37 5

[REDACTED]

10:44:39 6

A.

[REDACTED]

10:44:41 7

[REDACTED]

[REDACTED]

10:44:43 8

[REDACTED]

10:44:46 9

[REDACTED]

10:44:48 10

[REDACTED]

10:44:49 11

Q.

Are you aware of specific differences in

10:44:52 12

the audit process across the organization?

10:44:55 13

A.

[REDACTED]

10:44:56 14

[REDACTED]

10:44:57 15

Q.

Okay.

[REDACTED]

10:44:59 16

[REDACTED]

10:45:02 17

[REDACTED]

10:45:04 18

[REDACTED]

10:45:07 19

A.

[REDACTED]

10:45:07 20

Q.

Okay.

[REDACTED]

10:45:19 21

[REDACTED]

10:45:22 22

[REDACTED]

10:45:22 23

A.

[REDACTED]

[REDACTED]

10:45:23 24

Q.

[REDACTED]

10:45:26 25

[REDACTED]

10:45:29 1 MR. KIERNAN: Object to form.

10:45:32 2 THE WITNESS: [REDACTED]

10:45:34 3 [REDACTED]

10:45:37 4 [REDACTED]

10:45:40 5 [REDACTED]

10:45:41 6 [REDACTED]

10:45:45 7 [REDACTED]

10:45:47 8 [REDACTED]

10:45:50 9 [REDACTED]

10:45:51 10 BY MS. DERMODY:

10:45:51 11 Q. [REDACTED]

10:45:53 12 [REDACTED]

10:45:55 13 [REDACTED]

10:45:56 14 A. [REDACTED]

10:45:59 15 [REDACTED]

10:46:20 16 Q. [REDACTED]

10:46:23 17 [REDACTED]

10:46:34 18 A. [REDACTED]

10:46:36 19 [REDACTED]

10:46:39 20 [REDACTED]

10:46:42 21 [REDACTED]

10:46:44 22 [REDACTED]

10:46:46 23 [REDACTED]

10:46:49 24 [REDACTED]

10:46:52 25 [REDACTED]

10:46:54 1

10:46:57 2

10:47:00 3

10:47:02 4

10:47:03 5

10:47:05 6

10:47:10 7

10:47:15 8

10:47:19 9

10:47:20 10

10:47:22 11

10:47:24 12

10:47:24 13

10:47:26 14

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10:47:30 16

10:47:30 17

10:47:32 18

10:47:35 19

10:47:35 20

10:47:38 21

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10:47:46 25

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q. In terms of the factors that would go into evaluating whether an employee should get a greater or lesser increase in pay, what role did retention come into that?

MR. KIERNAN: Object to form.

THE WITNESS: I'm not sure I completely understand your question.

BY MS. DERMODY:

Q. Did you have retention ratings for employees?

A. We do have retention ratings for employees.

Q. Can you describe how those worked during the time period that you were an HR business partner?

A. Can you say more about what you mean about how they worked?

Q. How were managers instructed to use retention ratings?

A. [REDACTED]

[REDACTED]

10:47:49 1 [REDACTED]

10:47:51 2 [REDACTED] [REDACTED]

10:47:54 3 [REDACTED] [REDACTED]

10:47:58 4 [REDACTED]

10:48:00 5 [REDACTED]

10:48:01 6 [REDACTED]

10:48:03 7 [REDACTED] [REDACTED]

10:48:05 8 [REDACTED]

10:48:07 9 [REDACTED] [REDACTED]

10:48:09 10 [REDACTED]

10:48:12 11 [REDACTED], the combination of their retention

10:48:14 12 rating and the performance rating and other

10:48:16 13 factors influenced eligibility for equity. It had

10:48:20 14 no bearing at all on base pay.

10:48:30 15 Q. [REDACTED]

10:48:32 16 [REDACTED]

10:48:35 17 [REDACTED]

10:48:37 18 [REDACTED]

10:48:40 19 A. [REDACTED] [REDACTED]

10:48:47 20 Q. [REDACTED]

10:48:50 21 [REDACTED]

10:48:54 22 [REDACTED]

10:48:56 23 A. [REDACTED]

10:48:58 24 [REDACTED]

10:49:01 25 [REDACTED] [REDACTED]

10:49:04 1 [REDACTED]

10:49:06 2 [REDACTED]

10:49:09 3 The primary difference between it is trying to

10:49:11 4 identify talent that we believe is going to be a

10:49:13 5 creative to the future of the company. And

10:49:16 6 there's a number of different factors that can go

10:49:18 7 into that. So it could be skill set. It could be

10:49:20 8 institutional knowledge. It could be things like

10:49:23 9 what we see as runway for future growth and the

10:49:26 10 opportunity to take on larger roles.

10:49:27 11 [REDACTED]

10:49:29 12 [REDACTED]

10:49:32 13 [REDACTED]

10:49:35 14 [REDACTED]

10:49:37 15 Q. [REDACTED]

10:49:43 16 [REDACTED]

10:49:46 17 [REDACTED]

10:49:53 18 MR. KIERNAN: Object to form.

10:49:53 19 THE WITNESS: [REDACTED]

10:49:58 20 [REDACTED]

10:50:03 21 [REDACTED]

10:50:06 22 [REDACTED]

10:50:08 23 [REDACTED]

10:50:10 24 [REDACTED]

10:50:13 25 [REDACTED]

10:53:13 1 committee meetings of the board?

10:53:17 2 A. No, I did not.

10:53:20 3 Q. And was there a regular HR business
10:53:23 4 partner meeting that you attended, or were those
10:53:26 5 more ad hoc?

10:53:27 6 A. When I was in the compensation role?

10:53:29 7 Q. Yes.

10:53:29 8 A. Those were more ad hoc.

10:53:36 9 Q. What was your understanding of the
10:53:37 10 purpose of Mr. Grenier's meetings?

10:53:44 11 A. My meetings?

10:53:45 12 Q. The ones that you attended when you were
10:53:46 13 in the compensation role.

10:53:47 14 A. His staff meetings were kind of typical
10:53:50 15 staff meetings of updates on things happening
10:53:52 16 within the organization. So update things --
10:53:55 17 updates on things happening at an Intuit level,
10:53:58 18 things happening within the HR organization,
10:53:59 19 updates on things that were happening inside of
10:54:01 20 the total rewards team, you know, projects that we
10:54:05 21 were working on, kind of typical staff meeting
10:54:08 22 types of things.

10:54:10 23 Q. Did the topic of recruiting come up in
10:54:12 24 connection with your compensation work?

10:54:16 25 A. Say more about that. Recruiting as a --

10:54:20 1 we were not recruiting, but we did work with the
10:54:25 2 recruiting organization inside the organization,
10:54:27 3 and so, sure, it may have come up.

10:54:31 4 Q. Did you have any role in setting
10:54:34 5 recruiting policy?

10:54:37 6 A. No.

10:54:45 7 Q. In case there's any doubt, I'm asking
10:54:47 8 you about the 2005/2008 time period. And I'll try
10:54:51 9 to be clear if I'm not asking about that time
10:54:53 10 period. Okay?

10:54:53 11 A. Okay.

10:55:09 12 Q. Did you ever attend any board of
10:55:10 13 directors meetings in the 2005/2008 time period?

10:55:14 14 A. No.

10:55:15 15 Q. How about when you were an HR business
10:55:16 16 partner role?

10:55:17 17 A. No.

10:55:37 18 Q. Again, in the 2005/2008 time period,
10:55:41 19 what was your role in developing the annual merit
10:55:44 20 budget for Intuit?

10:55:48 21 A. I had the responsibility of making
10:55:49 22 recommendation.

10:55:52 23 Q. Can you walk me through the process that
10:55:53 24 you had to do that?

10:55:56 25 A. [REDACTED]

10:55:59 1

10:56:02 2

10:56:04 3

10:56:06 4

10:56:08 5

10:56:11 6

10:56:13 7

10:56:16 8

10:56:18 9

10:56:21 10

10:56:23 11

10:56:26 12

10:56:28 13

10:56:31 14

10:56:36 15

10:56:38 16

10:56:41 17

10:56:43 18

10:56:44 19

10:56:46 20

10:56:49 21

10:56:51 22

10:56:54 23

10:56:57 24

10:56:59 25

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] And then I made a

recommendation of what seemed like an appropriate
merit budget.

Q. Did you ever have occasion to call your
colleagues at other companies to find out what
they were doing around merit increase?

A. Sure.

Q. And were there certain people that you
frequently reached out to?

A. I don't recall any specifics. I've had
connections in the valley for a long time, and so
would reach out to others that were in similar
roles just to get their sense of what was
happening and what they were thinking.

10:57:01 1 Q. And did that include people that were at
10:57:03 2 Google?

10:57:04 3 A. No.

10:57:07 4 Q. How about at Apple?

10:57:08 5 A. I'm going to say no. I've had some
10:57:11 6 contacts at Apple, but never contact -- never of
10:57:13 7 that nature.

10:57:14 8 Q. How about Intel?

10:57:16 9 A. I was in a group that -- there was --
10:57:20 10 there was a group of compensation professionals in
10:57:23 11 the -- in the valley that were focused on --
10:57:25 12 primarily on equity compensation and primarily
10:57:29 13 focused on equity compensation outside the U.S.
10:57:32 14 Intel did participate in that group, and so we may
10:57:35 15 have discussed things like merit budgets and
10:57:38 16 things in some of those conversations.

10:57:40 17 Q. Okay. What about Adobe? Did you have a
10:57:44 18 colleague there that you would speak with about
10:57:47 19 these issues?

10:57:47 20 A. No.

10:57:49 21 Q. Lucasfilm?

10:57:50 22 A. No.

10:57:51 23 Q. Pixar?

10:57:52 24 A. No.

10:59:03 25 MS. DERMODY: Is that 2735?

10:59:05 1 THE REPORTER: Yes.

10:59:05 2 MS. DERMODY: Thanks.

10:59:06 3 (Whereupon, Deposition Exhibit 2735
10:59:06 4 was marked for identification.)

10:59:05 5 BY MS. DERMODY:

10:59:06 6 Q. Mr. Stubblefield, the document we've
10:59:07 7 just marked as Exhibit 2735 has a number below.
10:59:13 8 It's a Google document that starts 480 --

10:59:17 9 MR. KIERNAN: Can I -- I hate to do
10:59:18 10 this. It's marked attorney's eyes only from
10:59:22 11 Google.

10:59:23 12 MS. DERMODY: His name is on the
10:59:24 13 document.

10:59:25 14 MR. KIERNAN: On the top?

10:59:27 15 MS. DERMODY: Yeah.

10:59:27 16 MR. KIERNAN: Okay. All right. I'm
10:59:28 17 just making sure.

10:59:30 18 BY MS. DERMODY:

10:59:32 19 Q. Anyway, it's marked -480249.

10:59:35 20 Do you see that?

10:59:36 21 A. I do.

10:59:37 22 Q. And do you recognize this document?

10:59:40 23 A. I don't. I can't say I recognize it
10:59:42 24 specifically. It's from a long time ago. But you
10:59:46 25 asked about Adobe. So Adobe was also in the

10:59:49 1 group, the silicon -- the group that was focused
10:59:52 2 on equity practices, so Adobe was in that group.

10:59:55 3 Q. Okay. And if you look at this e-mail,
10:59:59 4 the top e-mail from Jim Johnson at Seagate, which
11:00:02 5 is sent to a number of people, and you're copied
11:00:06 6 on that, do you see that?

11:00:07 7 A. I do see that.

11:00:08 8 Q. It attaches another e-mail below where
11:00:10 9 the e-mail addresses of the recipients are spelled
11:00:13 10 out.

11:00:13 11 Do you see that?

11:00:14 12 A. I do see that.

11:00:15 13 Q. Does this refresh your recollection that
11:00:16 14 in that group was a woman from Apple?

11:00:20 15 A. Yes, I do see that.

11:00:22 16 Q. And a woman from Adobe?

11:00:23 17 A. Yes.

11:00:25 18 Q. And a woman from Intel?

11:00:30 19 A. Yes.

11:00:33 20 Q. And was -- were those people all in this
11:00:35 21 group that you mentioned as the group of Silicon
11:00:37 22 Valley HR people that would communicate about
11:00:42 23 different comp issues?

11:00:43 24 MR. KIERNAN: Object to form.

11:00:47 25 THE WITNESS: Some of them were.

11:00:47 1 There's some of the names on here that I don't
11:00:50 2 recognize from that group, so they may have been
11:00:52 3 communications from someone else. So the name
11:00:57 4 from Apple, the name from Adobe I do recognize
11:00:59 5 being in the group. The one from Intel I actually
11:01:02 6 don't recognize. That's not a person I'm familiar
11:01:04 7 with.

11:01:06 8 BY MS. DERMODY:

11:01:23 9 Q. You see also there's a Mr. Wagner from
11:01:26 10 Google? Do you see that?

11:01:27 11 A. I do see that.

11:01:28 12 Q. Does that refresh your recollection
11:01:30 13 Mr. Wagner was also on that group?

11:01:32 14 A. I don't believe I know Mr. Wagner.

11:01:34 15 Q. Do you recall him being part of a group
11:01:36 16 of e-mails with other people in the valley about
11:01:39 17 different compensation issues?

11:01:41 18 A. I see it on here. I can't say I recall
11:01:45 19 it. I don't believe I know him. It's been five
11:01:47 20 years ago, so not someone that I -- that I recall.

11:01:52 21 (Whereupon, Deposition Exhibit 2736
11:01:52 22 was marked for identification.)

11:02:43 23 BY MS. DERMODY:

11:02:44 24 Q. Mr. Stubblefield, there's another
11:02:45 25 document placed in front of you, it's marked 1736

11:02:48 1 [sic]. This one comes from the Intuit file and
11:02:52 2 should have the number 53086 in the front. Do you
11:02:54 3 see that?

11:02:55 4 A. Yes, I do.

11:02:58 5 Q. And is this an e-mail sent from
11:03:01 6 Mr. Grenier -- Grenier?

11:03:06 7 A. Grenier.

11:03:07 8 Q. -- Grenier to you and Mr. Parrish --
11:03:14 9 excuse me, Mr. Pullen?

11:03:16 10 A. Yes.

11:03:16 11 Q. And this is attaching another e-mail
11:03:21 12 which is from someone at Macromedia with a
11:03:24 13 subject, "Incentive Compensation structure for
11:03:26 14 Sales Executives."

11:03:28 15 Do you see that?

11:03:28 16 A. Yes, I do.

11:03:29 17 Q. And in the list of people in this e-mail
11:03:32 18 from the person at Macromedia, there's a recipient
11:03:38 19 at Adobe.

11:03:39 20 Do you see that?

11:03:43 21 A. Yes.

11:03:44 22 Q. And at Google.

11:03:46 23 Do you see that?

11:03:46 24 A. Yes.

11:03:46 25 Q. And do you recognize those people as

11:03:49 1 being part of this Silicon Valley group that
11:03:50 2 discussed different compensation issues?

11:03:52 3 MR. KIERNAN: Object to form.

11:03:56 4 THE WITNESS: No, I do not.

11:03:57 5 BY MS. DERMODY:

11:03:57 6 Q. Do you know who kpoole is at Google?

11:04:00 7 A. No, I do not.

11:04:01 8 Q. Do you know who Ellens is at Adobe?

11:04:04 9 A. Maybe. I think so.

11:04:07 10 Q. Okay. And who is that?

11:04:10 11 A. I think it's Ellen Sworthouse, but I'm
11:04:14 12 not positive.

11:04:16 13 Q. As indicated in this message from the
11:04:17 14 Macromedia person, she says:

11:04:22 15 "As part of our FY06
11:04:24 16 Executive Sales Compensation Plan
11:04:26 17 design process I am interested in
11:04:29 18 a brief confidential data exchange
11:04:31 19 with you. We will use this
11:04:33 20 information along with other
11:04:34 21 market information (i.e. Radford)
11:04:37 22 to compare our plan against market
11:04:39 23 practice. I will summarize the
11:04:40 24 findings and share them with those
11:04:43 25 of you who respond."

11:04:44 1 Do you see that?

11:04:44 2 A. Yes.

11:04:45 3 Q. Do you recall there being an exchange
11:04:47 4 about incentive compensation for sales executives?

11:04:50 5 A. I -- I don't recall.

11:04:52 6 Q. Do you know if you participated in this?

11:04:54 7 A. I don't know.

11:04:55 8 Q. Is this something that you would
11:04:56 9 normally have participated in?

11:04:59 10 A. It might be.

11:05:01 11 Q. And do you recall there being occasions
11:05:04 12 where you exchange information about specific
11:05:07 13 types of employee compensation with other
11:05:09 14 companies?

11:05:10 15 MR. KIERNAN: Object to form.

11:05:11 16 THE WITNESS: Questions like this,
11:05:19 17 you've seen another example of questions like this
11:05:21 18 were not uncommon or not uncommon to try to get
11:05:24 19 information. I wouldn't say that they're about
11:05:25 20 specific employees. They might be about a group
11:05:28 21 of employees. And they were generally at a broad
11:05:29 22 level of what are your practices in these areas.
11:05:32 23 So, yes, I recall things like that happening and I
11:05:34 24 can't tell you specifics.

11:05:36 25 BY MS. DERMODY:

11:05:36 1 Q. Okay. And do you recall there being
11:05:38 2 communications where there were exchanges about
11:05:41 3 compensation ranges or compensation approaches for
11:05:44 4 different groups of employees to share with other
11:05:46 5 companies in the valley?

11:05:50 6 A. I don't recall any specific examples of
11:05:52 7 things like that.

11:05:54 8 Q. Even though you can't recall the
11:05:56 9 specific example, do you recall that that
11:05:58 10 happened?

11:06:02 11 A. There were exchanges around practices
11:06:04 12 and things like this. I don't recall situations
11:06:07 13 around specific ranges of compensation for
11:06:10 14 employees. I wouldn't say it didn't happen, but I
11:06:12 15 don't recall that happening.

11:06:14 16 Q. Okay. In addition to the e-mail group
11:06:25 17 that you were part of with other companies in the
11:06:28 18 valley, did you have occasion to go to dinner or
11:06:32 19 socialize with groups of HR professionals from
11:06:35 20 other Silicon Valley companies?

11:06:39 21 A. It wasn't actually an e-mail group. It
11:06:42 22 was a group that met live about once every two
11:06:44 23 months, and then e-mail might be a method of
11:06:47 24 follow-up if there were things that came out
11:06:49 25 afterwards. But it was a group that met

11:06:52 1 specifically to talk about equity issues. There
11:06:53 2 may have been some social aspects attached to
11:06:56 3 that. I don't recall going out to dinner with
11:06:58 4 anyone else regularly or things like that. There
11:06:59 5 are conferences and things like that that exist in
11:07:01 6 the valley that have a social aspect to them.

11:07:05 7 Q. And did the group you met with every two
11:07:07 8 months have a name to it?

11:07:08 9 A. It was called the -- I want to say it
11:07:13 10 was called the Silicon Valley Global Equity Forum,
11:07:16 11 or something like that. So it did have a formal
11:07:19 12 name and it was a formal group.

11:07:25 13 Q. And do you recall, in connection with
11:07:26 14 that group meeting, there being discussions of
11:07:29 15 compensation below the executive level?

11:07:34 16 A. The focus of the group was primarily on
11:07:36 17 equity practices outside the U.S., and it would
11:07:38 18 have been beyond executives.

11:07:41 19 Q. And how about discussions involving
11:07:43 20 domestic workers?

11:07:44 21 A. The focus was primarily around equity,
11:07:46 22 and it would have included -- would have included
11:07:48 23 workers. It was primarily outside the U.S. It
11:07:51 24 would have had occasions where the U.S. practices
11:07:53 25 would have come into that as well.

11:09:07 1 A. It -- it actually had started prior to
11:09:08 2 that, so it was a group that I had participated
11:09:12 3 with when I was at NetApp, and so it started
11:09:16 4 sometime prior to that. I don't remember exactly
11:09:17 5 when it started and I don't remember -- I don't
11:09:20 6 know how it evolved over the years after that
11:09:22 7 either.

11:09:23 8 Q. And was that group continuing to meet at
11:09:27 9 the time you moved into the HR business partner
11:09:29 10 role in 2008?

11:09:31 11 A. The formal group itself did. I don't
11:09:34 12 believe Intuit continued to participate in it.

11:09:36 13 Q. Do you know when Intuit stopped
11:09:37 14 participating in it?

11:09:39 15 A. I think Intuit stopped participating
11:09:40 16 when I moved out of the role.

11:09:42 17 MS. DERMODY: Okay. I promised you a
11:09:55 18 break every hour, so let's take a break.

11:09:59 19 MR. KIERNAN: Yeah. Good.

11:10:01 20 THE VIDEOGRAPHER: This is the end of
11:10:01 21 Video Number 1. The time is 11:10 a.m. We are
11:10:04 22 going off the record.

11:10:10 23 (Whereupon, a recess was taken.)

11:23:31 24 THE VIDEOGRAPHER: This is the beginning
11:23:32 25 of Video Number 2 in the deposition of Mason

11:23:35 1 Stubblefield. The time is 11:23 a.m. We're back
11:23:38 2 on the record.

11:23:39 3 BY MS. DERMODY:

11:23:40 4 Q. Mr. Stubblefield, at some point in that
11:23:44 5 2005/2008 time period, were you involved in
11:23:47 6 developing what we called a proxy peer group for
11:23:51 7 Intuit?

11:23:51 8 A. Yes.

11:23:52 9 Q. And what was that?

11:23:56 10 A. What was the proxy peer group?

11:23:59 11 Q. Yes.

11:23:59 12 A. From an executive compensation
11:24:00 13 perspective, we look at a group of proxy peers,
11:24:03 14 which is essentially what our shareholders are
11:24:05 15 looking at to evaluate our executive compensation
11:24:08 16 decisions.

11:24:08 17 Q. And do you recall who was included among
11:24:10 18 your proxy peers?

11:24:11 19 A. I don't recall specifically all the
11:24:13 20 companies at this point.

11:24:14 21 Q. Okay. Do you recall if Intel was part
11:24:16 22 of that group?

11:24:16 23 A. I don't recall specific names.

11:24:20 24 Q. Adobe?

11:24:20 25 A. Like I said, I don't recall specific

11:24:22 1 names. There was 20, 25 companies that were in
11:24:24 2 it.

11:24:25 3 Q. Okay. And what was the process you went
11:24:28 4 through to come up with that list?

11:24:33 5 A. [REDACTED]
11:24:35 6 [REDACTED]
11:24:39 7 [REDACTED]
11:24:42 8 [REDACTED]
11:24:44 9 [REDACTED]
11:24:47 10 [REDACTED]
11:24:49 11 [REDACTED]
11:24:51 12 [REDACTED]
11:24:54 13 [REDACTED]
11:24:58 14 [REDACTED]
11:24:59 15 [REDACTED]
11:25:01 16 [REDACTED]

11:25:08 17 Q. And do you recall in that same time
11:25:10 18 period who were considered to be the talent peers
11:25:12 19 for Intuit?

11:25:14 20 A. I don't recall specific companies. It
11:25:17 21 varies by -- Intuit's a collection of different
11:25:20 22 business units, and those peers would vary quite a
11:25:23 23 bit by business unit.

11:25:25 24 Q. Do you recall any of the companies?

11:25:28 25 A. I can think of a few names that would

11:25:30 1 probably come up with a valley perspective, but we
11:25:32 2 would also look at other companies outside.
11:25:34 3 Companies like Paychecks or ADP from a payroll
11:25:37 4 perspective. Companies like Yahoo!, eBay may
11:25:40 5 have been -- would have been in the group. NetApp
11:25:43 6 was in the group at one point.

11:25:45 7 Q. What about Google?

11:25:47 8 A. Google would probably have been in the
11:25:48 9 group as well.

11:25:49 10 Q. How about Intel?

11:25:51 11 A. I don't recall specifically about Intel.

11:25:53 12 Q. Okay. Adobe?

11:25:55 13 A. Like I said, I don't recall specifically
11:25:56 14 about Adobe. So being a software company, we
11:26:00 15 looked at other software companies, again, looking
11:26:03 16 at different parts of our business.

11:26:08 17 Q. Do you recall if Apple was part of that
11:26:10 18 group?

11:26:11 19 A. I don't recall the specific names of
11:26:12 20 companies that were in the group.

11:27:04 21 Q. I can't tell from the transcript if this
11:27:05 22 was captured. I asked you about Google being in
11:27:08 23 that group.

11:27:09 24 Is it your testimony that Google would
11:27:11 25 have been in that peer talent group?

11:27:14 1 A. I don't recall specifically who the
11:27:15 2 companies were in the peer group.

11:27:16 3 (Whereupon, Deposition Exhibit 2737
11:27:16 4 was marked for identification.)

11:27:32 5 BY MS. DERMODY:

11:27:37 6 Q. The document that's been marked 2737
11:27:40 7 should have an Intuit number -53096.

11:27:43 8 Do you see that?

11:27:44 9 A. Yes, I do.

11:27:45 10 Q. And is this an e-mail from Mr. Grenier
11:27:49 11 to you from June 28, 2005?

11:27:53 12 A. Yes, it is.

11:27:55 13 Q. And if you look down at the attached
11:27:58 14 e-mail, there's an e-mail from you to various
11:28:03 15 people listing companies that -- it says you got
11:28:12 16 from our executive recruiting leader, and it has a
11:28:14 17 list of companies and then local competition for
11:28:17 18 talent.

11:28:17 19 Do you see that?

11:28:18 20 A. Yes, I see that.

11:28:19 21 Q. [REDACTED]

11:28:20 22 A. [REDACTED]

11:28:22 23 Q. [REDACTED]

11:28:24 24 [REDACTED]

11:28:26 25 A. [REDACTED] [REDACTED]

11:28:28 1

[REDACTED]

11:28:34 2

Q. Do you recall developing lists like this as reflected in Exhibit 2737?

11:28:37 3

11:28:41 4

A. I see that I did it here, and like I say, this was -- [REDACTED]

11:28:44 5

11:28:47 6

[REDACTED]

11:28:50 7

[REDACTED]

11:28:53 8

[REDACTED]

11:29:11 9

Q. Did you have occasion in the 2005 to 2008 time period, when you were working in the compensation area or after that, when you were an HR business partner, to assist with counteroffers for Intuit employees who might have been recruited elsewhere?

11:29:16 10

11:29:19 11

11:29:22 12

11:29:25 13

11:29:27 14

11:29:30 15

A. Yes.

11:29:30 16

Q. And tell me, was that the entire time period, or was that only when you were an HR business partner?

11:29:32 17

11:29:35 18

11:29:37 19

A. It may have happened in some situations as a compensation consultant or adviser, so may have happened in some cases in both roles.

11:29:39 20

11:29:43 21

11:29:49 22

Q. When you were in the compensation role, what was your contribution to the counteroffer discussion, if that was happening?

11:29:51 23

11:29:55 24

11:29:59 25

A. [REDACTED]

11:30:02 1

[REDACTED]

11:30:06 2

[REDACTED]

11:30:09 3

[REDACTED]

11:30:10 4

[REDACTED]

11:30:13 5

[REDACTED]

11:30:14 6

[REDACTED]

11:30:17 7

[REDACTED]

11:30:20 8

[REDACTED]

11:30:22 9

[REDACTED]

11:30:25 10

[REDACTED]

11:30:28 11

[REDACTED]

11:30:28 12

Q.

[REDACTED]

11:30:29 13

[REDACTED]

11:30:33 14

[REDACTED]

11:30:37 15

A. I don't recall any -- any specific

11:30:38 16

situations.

11:30:40 17

Q. Do you recall that happening if you

11:30:41 18

don't recall the specifics?

11:30:48 19

A. I guess -- help me with more -- I

11:30:50 20

don't -- so I don't recall specific situation

11:30:53 21

of -- I don't recall a conversation like that. My

11:30:57 22

role may have been --

[REDACTED]

11:30:59 23

[REDACTED]

11:31:02 24

[REDACTED]

11:31:04 25

[REDACTED]

11:31:07 1

[REDACTED]

11:31:08 2

Q. Okay.

[REDACTED]

11:31:11 3

[REDACTED]

11:31:14 4

A. Generally, that would not be our

11:31:16 5

approach. Like I said earlier,

[REDACTED]

11:31:19 6

[REDACTED]

11:31:20 7

[REDACTED]

11:31:22 8

[REDACTED]

11:31:25 9

[REDACTED]

[REDACTED]

11:31:26 10

[REDACTED]

11:31:29 11

[REDACTED]

11:31:30 12

[REDACTED]

11:31:32 13

[REDACTED]

[REDACTED]

11:31:34 14

[REDACTED]

11:31:37 15

[REDACTED]

11:31:39 16

[REDACTED]

[REDACTED]

11:31:41 17

[REDACTED]

11:31:42 18

We might consider using retention

11:31:44 19

bonuses in some cases to try to get someone to

11:31:46 20

stay.

[REDACTED]

11:31:49 21

[REDACTED]

11:31:52 22

[REDACTED]

11:31:56 23

Q. And what is a retention bonus, or what

11:31:58 24

was it in that time period?

11:32:00 25

A. Retention bonus would be an opportunity

11:32:02 1 for an incremental cash payment at some point in
11:32:05 2 the future if an individual stayed through that
11:32:07 3 time period.

11:32:20 4 Q. And do you recall how you determined
11:32:21 5 what the amount of that kind of cash payment would
11:32:23 6 be?

11:32:26 7 A. There would be various different ways to
11:32:29 8 look at it. [REDACTED]

11:32:31 9 [REDACTED]

11:32:35 10 [REDACTED]

11:32:37 11 [REDACTED] [REDACTED]

11:32:38 12 [REDACTED]

11:32:40 13 Q. Can you explain what you mean by that?

11:32:42 14 A. [REDACTED]

11:32:44 15 [REDACTED] [REDACTED]

11:32:46 16 [REDACTED] [REDACTED]

11:32:49 17 [REDACTED] [REDACTED]

11:32:52 18 [REDACTED]

11:32:55 19 [REDACTED]

11:32:58 20 [REDACTED]

11:33:08 21 Q. Okay. And then when you moved into the
11:33:11 22 HR business partner role, did your responsibility
11:33:15 23 with respect to counteroffers change?

11:33:20 24 A. The role with it would still be a
11:33:22 25 consulting role with the business leader in trying

11:33:25 1 to help them think through ways to respond to a
11:33:27 2 situation. The nature of the role would be
11:33:29 3 different from being the compensation professional
11:33:31 4 to being their HR business partner, but still a
11:33:34 5 consultive role.

11:33:37 6 Q. Do you recall situations coming up when
11:33:38 7 you were in the HR business partner role where an
11:33:40 8 employee was looking elsewhere and the
11:33:45 9 counteroffer question was raised?

11:33:49 10 A. I don't recall any situations like that.

11:33:52 11 Q. Even if you can't recall specifics, do
11:33:54 12 you recall it happening?

11:33:55 13 A. I don't recall it happening.

11:33:57 14 Q. Okay. Is it your testimony that it
11:34:08 15 didn't happen or that you don't recall that it
11:34:10 16 happened?

11:34:10 17 A. It's that I don't recall.

11:34:11 18 Q. Okay. You've described a number of
11:34:42 19 categories of compensation; base salary, bonus and
11:34:49 20 equity being the main three. Is that correct?

11:34:52 21 A. Yes.

11:34:52 22 Q. And then there are opportunities for
11:34:55 23 other types of awards in the company; is that
11:34:57 24 correct?

11:35:00 25 A. Help me with how you define "awards."

11:35:03 1 Q. Sure.

11:35:04 2

11:35:06 3

11:35:08 4

11:35:11 5

A.

11:35:14 6

11:35:17 7

11:35:20 8

We talked a bit about retention

11:35:25 9

bonuses, which would also be a monetary reward

11:35:27 10

that could -- is used in some situations, would be

11:35:30 11

available for employees.

11:35:35 12

Q.

11:35:38 13

11:35:41 14

11:35:45 15

11:35:51 16

A.

11:35:52 17

11:35:52 18

Q. Yes.

11:35:55 19

A.

11:35:59 20

11:36:01 21

11:36:04 22

11:36:06 23

11:36:10 24

11:36:13 25

11:36:16 1

[REDACTED]

11:36:18 2

[REDACTED]

11:36:21 3

[REDACTED]

11:36:25 4

[REDACTED]

11:36:27 5

[REDACTED]

11:36:29 6

Q. Is that the spotlight program?

11:36:31 7

A. Yes, that's the spotlight program.

11:36:38 8

Q. [REDACTED]

11:36:41 9

[REDACTED]

11:36:41 10

A. Yes.

11:36:43 11

Q. [REDACTED]

11:36:46 12

A. [REDACTED]

11:36:55 13

[REDACTED]

11:37:03 14

Q. And for how long has the spotlight

11:37:05 15

program been around?

11:37:09 16

A. I don't know exactly when it started,

11:37:10 17

but it's been a key part of Intuit's compensation

11:37:13 18

approach for a number of years. Ten years or

11:37:15 19

more.

11:37:16 20

Q. Okay. So prior to your time maybe?

11:37:18 21

A. Yes. [REDACTED]

11:37:20 22

[REDACTED]

11:37:23 23

Q. [REDACTED]

11:37:26 24

[REDACTED]

11:37:33 25

[REDACTED]

11:37:36 1

[REDACTED]

11:37:38 2

A. [REDACTED]

11:37:39 3

Q. And describe those situations.

11:37:43 4

A. There's been situations in -- a few

11:37:47 5

different situations I can think of if there were

11:37:49 6

[REDACTED]

11:37:52 7

[REDACTED]

11:37:54 8

[REDACTED]

11:37:57 9

[REDACTED]

11:38:00 10

[REDACTED]

11:38:04 11

[REDACTED]

11:38:05 12

[REDACTED]

11:38:09 13

[REDACTED]

11:38:12 14

[REDACTED]

11:38:16 15

[REDACTED]

11:38:16 16

[REDACTED]

11:38:19 17

If we saw attrition in some area, we'd

11:38:23 18

use -- we use retention bonuses proactively to try

11:38:27 19

to secure, lock in, create the incentive for other

11:38:31 20

talent to stay.

11:38:35 21

Q. And has that been the practice going

11:38:37 22

back to when you started in 2004?

11:38:41 23

MR. KIERNAN: Object to form.

11:38:46 24

THE WITNESS: [REDACTED]

11:38:48 25

[REDACTED]

11:38:49 1

11:38:52 2

11:38:56 3

11:38:58 4

11:39:01 5

11:39:05 6

11:39:06 7

11:39:07 8

11:39:10 9

11:39:15 10

11:39:17 11

11:39:21 12

11:39:23 13

11:39:25 14

11:39:28 15

11:39:31 16

11:39:34 17

11:39:36 18

11:39:39 19

11:39:41 20

11:39:57 21

11:39:57 22

11:39:58 23

11:40:01 24

11:40:04 25

[REDACTED]

[REDACTED] So we've had retention bonuses where a tool that goes back to -- the start of my time as one of the tools that was out there. We primarily use equity as our retention vehicle, and it's been out there as well.

BY MS. DERMODY:

Q. And is equity something that you have used proactively to keep talent notwithstanding any other offer that they might have in the market?

MR. KIERNAN: Object to form.

THE WITNESS: [REDACTED]

[REDACTED] and based on the performance ratings, retention ratings, employees are given a value of equity.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

BY MS. DERMODY:

Q. And I think you testified earlier that the compensation, including decisions about equity, [REDACTED]

[REDACTED]

11:40:06 1 A. [REDACTED]

11:40:09 2 Q. [REDACTED]

11:40:11 3 [REDACTED]

11:40:16 4 [REDACTED]

11:40:18 5 A. [REDACTED]

11:40:20 6 [REDACTED]

11:40:23 7 [REDACTED] [REDACTED]

11:40:26 8 [REDACTED]

11:40:29 9 [REDACTED]

11:40:29 10 Q. Okay. [REDACTED]

11:40:33 11 [REDACTED]

11:40:34 12 A. [REDACTED] [REDACTED]

11:40:40 13 [REDACTED] [REDACTED]

11:40:43 14 [REDACTED]

11:40:46 15 [REDACTED]

11:40:51 16 Q. [REDACTED]

11:40:53 17 [REDACTED]

11:40:55 18 [REDACTED]

11:40:58 19 A. [REDACTED] [REDACTED]

11:40:59 20 [REDACTED]

11:40:59 21 Q. [REDACTED]

11:41:01 22 [REDACTED]

11:41:05 23 [REDACTED]

11:41:07 24 A. [REDACTED] [REDACTED]

11:41:09 25 [REDACTED]

11:41:11 1 Q. Okay. And describe those.

11:41:12 2 A. They'd be situations, oh, kind of like I
11:41:14 3 described before from a retention perspective. If
11:41:16 4 we saw attrition with a group of employees or a
11:41:19 5 certain skill set and we were concerned about
11:41:21 6 that, we'd use proactive equity grants with others
11:41:24 7 that we're seeing this top talent to try to incent
11:41:28 8 them to stay or use as another retention tool.

11:41:32 9 Q. Is that something that you've seen
11:41:34 10 happen going back to the 2005 time period?

11:41:40 11 A. I don't recall it happening -- it's not
11:41:42 12 something that happens very often inside the
11:41:43 13 organization. I can think of one situation where
11:41:45 14 it happened -- where it's happened, and that was
11:41:48 15 more recent.

11:41:49 16 Q. Okay. What was that situation?

11:41:50 17 A. [REDACTED]

11:41:52 18 [REDACTED]

11:41:55 19 [REDACTED]

11:41:57 20 [REDACTED]

11:42:00 21 [REDACTED]

11:42:04 22 [REDACTED]

11:42:06 23 [REDACTED]

11:42:19 24 Q. And do you know, were these employees
11:42:20 25 that had threatened to leave?

11:42:25 1 A. I don't know. [REDACTED]

11:42:28 2 [REDACTED]

11:42:31 3 [REDACTED]

11:42:33 4 [REDACTED]

11:42:37 5 [REDACTED]

11:42:45 6 Q. [REDACTED]

11:42:46 7 [REDACTED]

11:42:50 8 A. [REDACTED]

11:42:51 9 Q. Okay. And do you recall other

11:42:52 10 situations happening before that?

11:42:56 11 A. I don't recall other situations like

11:42:59 12 that.

11:43:01 13 Q. Is it possible that they happened but

11:43:04 14 you don't know? Is that --

11:43:05 15 A. Sure, it's possible.

11:43:30 16 Q. Are there any other strategies that

11:43:32 17 you're aware Intuit has used to proactively retain

11:43:37 18 key talent?

11:43:40 19 A. Yes.

11:43:41 20 Q. And can you describe those that are

11:43:44 21 compensation-based?

11:43:46 22 A. Most of the others would not be

11:43:48 23 compensation-based.

11:43:49 24 Q. Okay. Are those more work

11:43:54 25 assignment-based?

11:52:00 1 table inside that system and how values were set.

11:52:02 2 So it's a screen shot of PeopleSoft.

11:52:05 3 Q. Okay.

11:52:05 4 A. So this document on its own could never
11:52:08 5 have been produced by itself just based on it
11:52:10 6 being a collection of different things.

11:52:11 7 Q. Okay. On that nine blocker control
11:52:17 8 section --

11:52:17 9 A. Yes.

11:52:17 10 Q. -- can you just walk me through what the
11:52:19 11 different columns are?

11:52:28 12 A. I'll try.

11:52:29 13

11:52:31 14

11:52:35 15

11:52:37 16

11:52:40 17

11:52:42 18

11:52:46 19

11:52:49 20

11:52:51 21

11:52:53 22

11:52:56 23

11:52:59 24

11:53:01 25

11:53:05 1

11:53:08 2

11:53:10 3

11:53:12 4

11:53:15 5

11:53:19 6

11:53:21 7

11:53:22 8

11:53:24 9

11:53:27 10

11:53:31 11

11:53:36 12

11:53:42 13

11:53:48 14

11:53:51 15

11:53:53 16

11:53:56 17

11:53:59 18

11:54:02 19

11:54:05 20

11:54:07 21

11:54:10 22

11:54:12 23

11:54:16 24

11:54:19 25

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q. Okay. I'm not sure if the page that follows is an excerpt from the very last page or these are different things.

A. It's similar to what's on the very last page, and so it may have been -- it may have been part of a working product to get to what would end up on that last page. So it's from an Excel file and it was essentially a way to build or manage the targets that got put back into the control table, the nine block control table.

This would be the basis for having -- having an input document to put those -- those values into the system. [REDACTED]

[REDACTED]

11:54:22 1 [REDACTED]

11:54:27 2 [REDACTED]

11:54:29 3 [REDACTED]

11:54:32 4 [REDACTED] This is a document

11:54:38 5 that was used to build the system or to structure

11:54:40 6 values in the system.

11:54:41 7 Q. Okay. So if you were to take -- under

11:54:53 8 [REDACTED]

11:54:56 9 [REDACTED]

11:54:58 10 A. Okay.

11:54:58 11 Q. [REDACTED]

11:55:01 12 [REDACTED]

11:55:04 13 A. [REDACTED]

11:55:06 14 [REDACTED]

11:55:07 15 Q. Okay. [REDACTED]

11:55:10 16 [REDACTED]

11:55:14 17 [REDACTED]

11:55:16 18 A. [REDACTED]

11:55:16 19 Q. [REDACTED]

11:55:20 20 [REDACTED]

11:55:22 21 A. [REDACTED]

11:55:24 22 [REDACTED]

11:55:34 23 Q. So if I'm trying to read that -- [REDACTED]

11:55:37 24 [REDACTED]

11:55:42 25 [REDACTED]

11:55:48 1

[REDACTED]

11:55:50 2

A. Yes.

11:55:51 3

Q. Okay.

11:55:52 4

A. That's correct.

11:56:38 5

Q. Mr. Stubblefield, the document placed in

11:56:39 6

front of you should have a number in the front,

11:56:41 7

Exhibit 1761.

11:56:44 8

Do you see that?

11:56:44 9

A. Yes.

11:56:47 10

Q. If you'll open to the next page of it,

11:56:53 11

it starts what appears to be a PowerPoint, or

11:56:55 12

something like that, a presentation of some sort.

11:56:58 13

Do you recognize what this is?

11:57:01 14

A. So in looking at the presentation, I'm

11:57:04 15

familiar with it. I don't remember the -- I don't

11:57:06 16

know the exact context of how this was used.

11:57:09 17

Q. If you look on the second page, there

11:57:12 18

are page numbers in the lower left corner.

11:57:16 19

A. Yes.

11:57:16 20

Q. Might be helpful.

11:57:18 21

You'll see that there is a date in the

11:57:19 22

middle where it says January 7, 2005.

11:57:22 23

Do you see that?

11:57:23 24

A. Yes.

11:57:24 25

Q. And do you know in this time period who

11:57:26 1 would have created this document?

11:57:29 2 A. I -- I don't know for sure who would
11:57:31 3 have created it.

11:57:32 4 Q. This would have come out of the
11:57:34 5 compensation area presumably; is that correct?

11:57:36 6 A. Yes. Probably.

11:57:53 7 Q. If you could go to page 12 of the
11:57:56 8 document. Do you recognize what this is?

11:58:04 9 A. Yes.

11:58:05 10 Q. And what is this?

11:58:07 11 A. Within Intuit, we provided market
11:58:10 12 reference data to our employees. We were talking
11:58:12 13 earlier about the survey data and how we collect
11:58:15 14 that, so we provide that market reference data.

11:58:17 15

11:58:22 16

11:58:25 17

11:58:28 18

11:58:30 19

11:58:33 20

11:58:35 21

11:58:38 22

11:58:41 23

11:58:44 24

11:58:46 25

11:58:48 1 [REDACTED]

11:58:52 2 [REDACTED]

11:59:00 3 Q. [REDACTED]

11:59:02 4 [REDACTED]

11:59:07 5 [REDACTED]

11:59:07 6 A. [REDACTED]

11:59:12 7 Q. [REDACTED]

11:59:15 8 [REDACTED]

11:59:18 9 [REDACTED]

11:59:21 10 A. This tool is a resource to help managers

11:59:24 11 understand external market perspective and would

11:59:26 12 be used -- [REDACTED]

11:59:29 13 [REDACTED]

11:59:32 14 [REDACTED]

11:59:34 15 [REDACTED]

11:59:50 16 Q. Is there a tool that shows a manager

11:59:52 17 what the internal pay is, the high-low for

11:59:58 18 different jobs?

11:59:59 19 A. The compensation team does not provide a

12:00:01 20 tool like that.

12:00:04 21 Q. Do managers have access to what their

12:00:07 22 employees are making that they can look at?

12:00:09 23 A. Managers have access to what their own

12:00:11 24 employees make.

12:00:21 25 Q. If you could please turn to page 18.

12:00:30 1 And it should say "Development Bands:
12:00:33 2 Job Progression on a Career Track."

12:00:36 3 Is that what you're looking at?

12:00:38 4 A. Yes, it is.

12:00:39 5 Q. Can you explain what this is?

12:00:43 6 A. Intuit uses the idea of development
12:00:45 7 bands to help from a learning and development
12:00:47 8 perspective. There are five bands inside the
12:00:50 9 company. They are described on the left side.

12:00:54 10 Each job that we have fits into a band,
12:00:58 11 and so this is just trying to display how, as you
12:01:00 12 move up in the organization or move through
12:01:02 13 different levels of jobs, the -- that does move
12:01:05 14 through our band structure, and also kind of the
12:01:09 15 expectation of the scope, a little bit about the
12:01:11 16 scope and expectation of what would go with those
12:01:14 17 differences in bands.

12:01:16 18 So it was a way -- an attempt and a way
12:01:19 19 to illustrate how someone could grow in their
12:01:21 20 career with the company across different job
12:01:23 21 family or different jobs.

12:01:25 22 Q. And is the expectation that as one moves
12:01:29 23 up in different job families, that there'll be
12:01:35 24 increased opportunity for compensation?

12:01:40 25 A. I think most people have that

12:01:41 1 expectation. And I -- this doesn't necessarily
12:01:46 2 show that there's always progression across levels
12:01:47 3 across our bands because there's some overlap
12:01:50 4 across them. But, yeah, most people would have an
12:01:52 5 expectation that compensation would grow as they
12:01:55 6 move up in the more senior level roles. This does
12:02:02 7 not define a compensation structure.

12:02:12 8 Q. If you to go to page 20, please.

12:02:24 9 So this has at the top how Intuit makes
12:02:28 10 decisions about job and compensation. That is
12:02:31 11 what you're looking at?

12:02:32 12 A. Yes.

12:02:32 13 Q. Can you walk me through this process
12:02:35 14 that's described called leveling?

12:02:39 15 A. Sure.

12:02:41 16 So we have -- we have defined levels
12:02:44 17 inside the organization. Jobs fit into levels.
12:02:48 18 We are able to take those and connect them back to
12:02:50 19 the surveys like the Radford Survey. So our
12:02:53 20 levels are not identical to Radford's, but we have
12:02:56 21 our own expectations of the differences in the job
12:02:58 22 levels.

12:02:58 23 And different numbers of levels get used
12:03:00 24 in different job families based on business needs.
12:03:03 25 But we use that to get some level -- some

12:03:05 1 consistency across the organization.

12:03:08 2 We provide that as a basic piece of
12:03:10 3 infrastructure that would help leaders have access
12:03:13 4 to that external market data. So when they're
12:03:17 5 choosing to hire, open a position or promote
12:03:19 6 someone into a role, it gets grounded in that
12:03:22 7 level first and that gives you access to a set of
12:03:24 8 data.

12:03:29 9 Q. [REDACTED]

12:03:33 10 [REDACTED]

12:03:36 11 What is the Intuit benchmark profile, if
12:03:38 12 you know?

12:03:38 13 A. So we started calling them Intuit
12:03:40 14 benchmark levels or the Intuit benchmark profile
12:03:43 15 as something that's more consistent inside of the
12:03:46 16 organization versus being someone else's level.

12:03:48 17 And so we index it in some respect to
12:03:50 18 the surveys that we participate in so that we can
12:03:52 19 match our jobs to those surveys, but it's not
12:03:55 20 exactly the same as their level. So benchmark
12:03:59 21 kind of being the standard.

12:04:05 22 Q. And then on the right side where it is
12:04:11 23 described as the right compensation management
12:04:14 24 perspective, do you see that?

12:04:15 25 A. Yes.

12:04:16 1 Q. The second bullet point says, "Incentive
12:04:19 2 targets consistent by Intuit job," and that's in
12:04:22 3 quotes.

12:04:23 4 Do you know what that means?

12:04:25 5 A. Yes. We were -- and I'm going to tie it
12:04:29 6 back to the first bullet a little bit because they
12:04:32 7 are connected in this.

12:04:33 8 [REDACTED]
12:04:35 9 [REDACTED]
12:04:37 10 [REDACTED]
12:04:40 11 [REDACTED]
12:04:43 12 [REDACTED] [REDACTED]
12:04:46 13 [REDACTED]
12:04:50 14 [REDACTED] [REDACTED]
12:04:53 15 [REDACTED]
12:04:55 16 [REDACTED]
12:04:58 17 [REDACTED]
12:04:59 18 [REDACTED]
12:05:02 19 [REDACTED] [REDACTED]
12:05:05 20 [REDACTED]
12:05:08 21 [REDACTED]
12:05:08 22 [REDACTED] [REDACTED]
12:05:11 23 [REDACTED].

12:05:13 24 The job is that job profile which ties
12:05:16 25 back to kind of -- really ties back to the

12:05:19 1 benchmark level inside of Intuit. [REDACTED]

12:05:23 2 [REDACTED].

12:05:25 3 Q. Okay. And if you could go to 26,
12:05:35 4 please. This pay decision guidelines chart, is
12:05:44 5 this what you would describe as the pay for
12:05:46 6 performance system, that is the pay increases
12:05:52 7 based on performance ratings?

12:05:56 8 A. This was a tool that we gave to try to
12:05:58 9 assist leaders in making the decisions to reflect
12:06:00 10 the pay for performance philosophy.

12:06:14 11 Q. And can you describe for me the -- the
12:06:16 12 last column to the right, the [REDACTED]
12:06:21 13 [REDACTED]. What is that reflecting there?

12:06:24 14 A. [REDACTED]
12:06:26 15 [REDACTED]
12:06:29 16 [REDACTED]
12:06:33 17 [REDACTED]

12:06:37 18 Q. And do you know why in a couple boxes
12:06:38 19 there's more than one range?

12:06:43 20 A. No.

12:07:01 21 Q. Page 28 has a slide called "Making Stock
12:07:08 22 Option Decisions."

12:07:09 23 Do you see that?

12:07:10 24 A. Yes.

12:07:10 25 Q. The second item on this page says

12:07:12 1 "Retention... 'Risk' Management."

12:07:15 2 Do you see that?

12:07:16 3 A. Yes.

12:07:16 4 Q. You testified a little bit about this
12:07:17 5 earlier. Is this the process by which different
12:07:23 6 employees are rated depending on their role,
12:07:26 7 skill, talent?

12:07:28 8 A. This is an attempt in one bullet to
12:07:32 9 capture the essence of the retention ratings --

12:07:36 10 Q. Okay.

12:07:37 11 A. -- in that first bullet.

12:07:40 12 Q. Do you know if this is going to anything
12:07:42 13 else besides retention ratings? Was there any
12:07:44 14 other process to identify this high talent that
12:07:46 15 was independent of those ratings?

12:07:52 16 A. At different times we've had some
12:07:53 17 different processes that would have identified it.
12:07:55 18 Our expectation was that it was captured in the
12:07:58 19 retention ratings.

12:07:59 20 Q. And what have been those other processes
12:08:02 21 that have existed outside of that?

12:08:04 22 A. There's been different changes in the
12:08:05 23 business as we've had shifts in technology, focus
12:08:08 24 on technology that have led to different ways to
12:08:11 25 think about critical skills or talent.

12:08:14 1 Q. What would be an example of that?

12:08:16 2 A. There was a terminology that was used at
12:08:19 3 one point called cornerstone engineer.

12:08:21 4 Q. And what did that mean?

12:08:23 5 A. [REDACTED]

12:08:24 6 [REDACTED]

12:08:27 7 [REDACTED]

12:08:29 8 [REDACTED]

12:08:32 9 [REDACTED]

12:08:34 10 [REDACTED]

12:08:36 11 [REDACTED]

12:08:39 12 [REDACTED]

12:08:41 13 [REDACTED]

12:08:45 14 Q. And when the cornerstone engineer

12:08:52 15 concept was being used, [REDACTED]

12:08:56 16 [REDACTED]

12:08:59 17 [REDACTED]

12:09:01 18 A. [REDACTED]

12:09:03 19 [REDACTED]

12:09:06 20 [REDACTED]

12:09:09 21 [REDACTED]

12:09:12 22 [REDACTED]

12:09:16 23 [REDACTED]

12:09:18 24 [REDACTED]

12:09:20 25 [REDACTED]

12:09:20 1 Q. So in connection with the regular review
12:09:23 2 process, managers were trained that they should

12:09:25 3

12:09:28 4

12:09:28 5 A. I don't know exactly how we did it
12:09:31 6 specifically.

12:09:33 7 Q. Was the concept that it would be within
12:09:35 8 the regular review process?

12:09:37 9

A. Yes.

12:09:38 10

12:09:42 11

12:09:44 12

12:09:50 13

12:09:53 14

MS. DERMODY: Should we break for lunch?

12:09:55 15

MR. KIERNAN: Sure. Yeah. That works.

12:09:57 16

12:09:57 17

THE VIDEOGRAPHER: This is the end of
Video Number 2. The time is 12:09 p.m. We are
going off the record.

12:10:00 18

12:10:01 19

(Whereupon, a lunch recess was taken.)

12:10:03 20

AFTERNOON SESSION

01:04:54 21

01:04:55 22

THE VIDEOGRAPHER: This is the beginning
of Video Number 3 in the deposition of
Mason Stubblefield. The time is 1:04 p.m. We're
back on the record.

01:04:58 23

01:05:01 24

01:05:12 25

BY MS. DERMODY:

01:05:14 1 Q. Mr. Stubblefield, the document placed in
01:05:16 2 front of you was previously marked as
01:05:18 3 Exhibit 1760.

01:05:20 4 Do you see that?

01:05:20 5 A. Yes.

01:05:21 6 Q. And if you could turn the page to the
01:05:27 7 cover of this selection of slides or PowerPoint.
01:05:30 8 Do you recognize this document?

01:05:31 9 A. I -- I have seen it before. I don't
01:05:34 10 know the specific context of where it was used,
01:05:36 11 but ...

01:05:37 12 Q. If you look on the second page of the
01:05:38 13 document, again, there's page numbers in the
01:05:40 14 bottom left corner. There's a date in the middle
01:05:43 15 of that page.

01:05:44 16 Do you see that?

01:05:44 17 A. Yes.

01:05:47 18 Q. Do you know at this time period who
01:05:48 19 would have created this document? Would it have
01:05:50 20 been the same people as the document we had marked
01:05:52 21 as 1761?

01:05:55 22 A. I don't know specifically, but likely
01:05:56 23 the same people.

01:06:00 24 Q. Was this a presentation that you
01:06:01 25 attended?

01:06:02 1 A. I'd have to look through more of the
01:06:04 2 document to see.

01:06:05 3 Q. Sure. Go right ahead.

01:06:07 4 A. But it is -- it is probably a
01:06:10 5 presentation that I attended.

01:06:16 6 Yes.

01:06:17 7 Q. And who was this presented to?

01:06:22 8 A. Given the date that's on this document,
01:06:25 9 I'm not really sure who it was presented to. So
01:06:27 10 it's a -- it may actually be an earlier version of
01:06:30 11 what ended up as the other exhibit, so it's very
01:06:34 12 similar content. There's some -- potentially some
01:06:37 13 connection between those two.

01:06:38 14 It was potentially presented within the
01:06:40 15 HR team and probably, you know, potentially
01:06:42 16 presented to managers at some point later. The
01:06:44 17 January date throws me off a bit, because that's
01:06:47 18 earlier than we generally would have done
01:06:49 19 training.

01:06:50 20 Q. Okay. If you turn to page 6, there's a
01:06:55 21 statement at the top, "Compensation's Guiding
01:06:58 22 Principles."

01:06:59 23 Do you see that?

01:07:00 24 A. Yes.

01:07:00 25 Q. The third bullet point says, "Provide

01:07:02 1 equitable, competitive compensation opportunities
01:07:05 2 that attract and retain key talent."

01:07:08 3 Do you see that?

01:07:08 4 A. I see that.

01:07:10 5 Q. Do you know what is intended here by the
01:07:12 6 "equitable, competitive compensation" that's
01:07:14 7 described?

01:07:17 8 A. I don't know specifically what was
01:07:19 9 intended by that.

01:07:19 10 Q. Do you have an understanding of what
01:07:20 11 that means in this context?

01:07:24 12 A. I have a perspective, my perspective of
01:07:26 13 about what I think it might be, but I don't know
01:07:28 14 what was intended when it was written here.

01:07:30 15 Q. Okay. And what was your perspective?

01:07:33 16 A. So my perspective in looking at it is --
01:07:35 17 is, you know -- the intent of finer compensation
01:07:39 18 principles is to provide appropriate compensation
01:07:43 19 that's balancing a number of different factors,
01:07:44 20 one of those being the competitive landscape and
01:07:47 21 what else is happening in the marketplace.

01:07:51 22 Q. And where does the concept of equitable
01:07:54 23 treatment come into play?

01:07:58 24 A. Equitable is not a word that we use a
01:08:00 25 lot, actually, so I don't -- it's -- I don't know

01:08:02 1 the full context of this deck. This may have been
01:08:04 2 an earlier working product of something that ended
01:08:07 3 up being in the other exhibit and was language
01:08:10 4 that evolved over time. We talk much more about
01:08:12 5 appropriate and talk about return on investment.

01:08:15 6 Sometimes equitable has different views,
01:08:19 7 different meanings to different people, and so
01:08:20 8 it's a word we've generally stayed away from. We
01:08:24 9 tend to use the word "appropriate" more often.

01:08:26 10 (Whereupon, Deposition Exhibit 2739
01:08:26 11 was marked for identification.)

01:09:27 12 BY MS. DERMODY:

01:09:28 13 Q. Mr. Stubblefield, the document marked
01:09:29 14 2739 should have an Intuit number below that,
01:09:32 15 -43560. Is that what you're looking at?

01:09:35 16 A. Yes, it is.

01:09:36 17 Q. And if you take a moment to look at this
01:09:37 18 document and see if you recognize it.

01:09:42 19 A. Yes, I do.

01:09:45 20 Q. And what is this?

01:09:47 21 A. This was a document that we used to
01:09:50 22 provide some grounding material, foundational
01:09:54 23 material around the total rewards and pay
01:09:56 24 decisions. So used for our -- people in the HR
01:10:00 25 organization used for new managers in the

01:10:02 1 organization.

01:10:03 2 Q. Okay. And if you --

01:10:08 3 A. And other managers.

01:10:10 4 Q. Okay. And if you look at -- let's see.

01:10:14 5 A couple pages in, there is a date.

01:10:16 6 Do you see that, May 2005?

01:10:18 7 A. Yes.

01:10:19 8 Q. Okay. And does that indicate to you
01:10:20 9 that this was a document that was created in May
01:10:24 10 of 2005?

01:10:28 11 A. I don't know. It says that's when it
01:10:30 12 was created. But it's a time frame around when it
01:10:34 13 was used.

01:10:35 14 Q. And who would have been involved in
01:10:36 15 creating this document?

01:10:39 16 A. I would need to look more through the
01:10:41 17 document to know specifically who would have been
01:10:43 18 included in it.

01:10:44 19 Q. Sure. Take your time.

01:10:54 20 A. It would have been created by various
01:10:57 21 members of the total rewards team. It covers a
01:11:01 22 pretty broad section, really covers the broad base
01:11:02 23 of things from a rewards perspective, so it would
01:11:05 24 have had multiple participants.

01:11:07 25 Q. Would this have been a group that was

01:11:08 1 under your supervision at this time?

01:11:12 2 A. No. It would have been a group under
01:11:15 3 Mr. Grenier's supervision.

01:11:17 4 Q. And would this have been a training or a
01:11:20 5 toolkit that you would have been provided?

01:11:30 6 A. I would have helped produce this, so
01:11:32 7 myself or the group I worked with would have --
01:11:35 8 would have participated in some of the production
01:11:37 9 of this. As a result of that, I would have had a
01:11:38 10 copy of it. But the primary audience for it was
01:11:42 11 other leaders in the organization.

01:12:22 12 Q. So I apologize. I think on mine I don't
01:12:25 13 have page numbers. Does yours have page numbers?

01:12:27 14 A. No, it doesn't.

01:12:28 15 Q. This is going to be very fun, I can
01:12:29 16 tell. Okay.

01:12:50 17 MR. KIERNAN: Each page looks like it
01:12:52 18 has a different -- almost has a different heading.

01:12:57 19 BY MS. DERMODY:

01:12:57 20 Q. So I'm 15 pages into the deck. It says,
01:13:03 21 "Total Rewards Guiding Principles" at the top
01:13:08 22 label of the page.

01:13:09 23 A. Okay.

01:13:10 24 Q. Do you see that?

01:13:11 25 A. This one?

01:13:16 1 Q. There's a list of items here, and the
01:13:19 2 bottom one says, "Internal Equity and Global
01:13:21 3 Consistency."

01:13:23 4 Do you see that?

01:13:23 5 A. Yes, I do.

01:13:24 6 Q. And do you recall conversations about
01:13:29 7 one of the guiding principles of total rewards
01:13:32 8 being internal equity and global consistency?

01:13:37 9 A. I don't recall conversations about that.

01:13:49 10 Q. Do you know who would have created this
01:13:51 11 page in this training?

01:13:52 12 A. I don't know specifically who would have
01:13:54 13 created it, no.

01:13:56 14 Q. Okay. Turn to the next page. So the
01:14:02 15 16th page. It says at the top "Compensation
01:14:05 16 Positioning."

01:14:06 17 Do you see that?

01:14:07 18 A. Yes.

01:14:07 19 Q. Then it says in the box that's towards
01:14:10 20 the bottom, [REDACTED]

01:14:14 21 [REDACTED]

01:14:17 22 [REDACTED]

01:14:18 23 Do you see that?

01:14:19 24 A. I do.

01:14:20 25 Q. We talked a little bit about the market

01:14:21 1 research earlier.

01:14:25 2 What was the market research that was

01:14:27 3 [REDACTED]

01:14:30 4 A. I'm not sure specifically what the
01:14:32 5 reference would be in -- in this.

01:14:35 6 Q. Using this date as a guide post, do you
01:14:38 7 know what it was generally in 2005?

01:14:42 8 A. What -- I'm not sure I understand your
01:14:43 9 question.

01:14:44 10 Q. What the market research on [REDACTED]
01:14:46 11 [REDACTED]?

01:14:48 12 A. Probably would have been the Radford
01:14:49 13 Survey or other -- other salary surveys that we
01:14:52 14 used, and that would be an industry cut or an
01:14:55 15 industry view out of that data.

01:14:58 16 Q. Okay. Cut by tech software?

01:15:00 17 A. Yes.

01:15:03 18 Q. And then for [REDACTED], do you
01:15:06 19 know what market research would have been used in
01:15:10 20 this time frame?

01:15:12 21 A. I'm not sure what that would have been.

01:15:15 22 Q. Okay. And the reference to [REDACTED]
01:15:17 23 [REDACTED] do you know what that market research
01:15:20 24 would be?

01:15:20 25 A. I'm not sure specifically what it refers

01:15:22 1 to here. When we talked about salary surveys
01:15:24 2 earlier, we talked about the regional cuts that we
01:15:27 3 look at for the geographic basis. It may be a
01:15:31 4 reference to that.

01:15:44 5 Q. I'm going to try to use as little of
01:15:47 6 this document as possible because it's really hard
01:15:48 7 to use without page numbers, so bear with me. A
01:15:53 8 lot of it is material I believe used in other
01:15:56 9 documents we're looking at.

01:16:06 10 Okay. Of course. So about halfway
01:16:10 11 through the document, there is a page that says
01:16:13 12 "New Hire Guidelines" and it's a chart.

01:16:28 13 A. Okay. I think I'm close.

01:16:43 14 Q. That is exactly the chart, yes. Thank
01:16:46 15 you.

01:16:46 16 A. Okay.

01:16:47 17 Q. Can you describe for me what this
01:16:48 18 reflects?

01:16:52 19 A. [REDACTED]

01:16:55 20 [REDACTED]

01:16:59 21 [REDACTED]

01:17:02 22 [REDACTED]

01:17:05 23 [REDACTED]

01:17:08 24 [REDACTED]

01:17:11 25 Q. [REDACTED]

01:17:16 1 [REDACTED]

01:17:18 2 [REDACTED]

01:17:23 3 [REDACTED]

01:17:34 4 A. [REDACTED]

01:17:36 5 [REDACTED] [REDACTED]

01:17:38 6 [REDACTED] They'd be

01:17:40 7 stored in documents like a document that's

01:17:43 8 probably behind this, and this is just a display

01:17:46 9 of that. So there's -- somewhere there's a

01:17:49 10 reference document that was the [REDACTED]

01:17:52 11 [REDACTED], probably in an Excel file or a

01:17:54 12 PowerPoint file, and this is just a snapshot of

01:17:57 13 that, or a picture of it.

01:17:58 14 Q. [REDACTED]

01:18:01 15 [REDACTED]

01:18:07 16 A. This is based on a different -- this is

01:18:10 17 based on a different model. [REDACTED]

01:18:12 18 [REDACTED]

01:18:15 19 [REDACTED] [REDACTED]

01:18:19 20 [REDACTED] [REDACTED]

01:18:23 21 [REDACTED]

01:18:26 22 [REDACTED] [REDACTED]

01:18:31 23 [REDACTED]

01:18:32 24 [REDACTED]

01:18:34 25 [REDACTED]

01:18:36 1 [REDACTED].

01:18:39 2 [REDACTED]

01:18:42 3 [REDACTED]

01:18:44 4 Q. And, again, this is used for equity; is

01:18:46 5 that right?

01:18:47 6 A. For stock option.

01:19:11 7 Q. If you could turn to the page that has

01:19:13 8 at the top, "What Is Banding?"

01:19:18 9 A. Okay.

01:19:29 10 Q. Let the team catch up.

01:19:32 11 MR. KIERNAN: I'm there.

01:19:33 12 MS. DERMODY: It's a hard document to

01:19:34 13 use. I apologize. It's how it came in the

01:19:36 14 system, so we'll do our best.

01:19:39 15 Q. Do you recognize what the material is on

01:19:40 16 this page?

01:19:46 17 A. Yes.

01:19:48 18 Q. And is this describing how you associate

01:19:53 19 similar jobs within a family?

01:19:59 20 A. It's not as much similar jobs within a

01:20:01 21 family as it is similar levels of jobs across the

01:20:04 22 whole organization. So this ties back to the

01:20:07 23 bands I just mentioned. So the leadership, leader

01:20:10 24 expert contributor is one of those as a band, one

01:20:13 25 of the five bands in the organization. This is

01:20:14 1 trying to define what those bands are.

01:20:18 2 Q. At the bottom of this page there is a
01:20:21 3 statement or a caption that says, "Common base of
01:20:26 4 job summaries and PS-8 titles and bands."

01:20:31 5 Do you see that?

01:20:31 6 A. I do.

01:20:32 7 Q. Do you know what that means?

01:20:33 8 A. No, I don't.

01:20:36 9 Q. Do you know what the PS-8 titles and
01:20:39 10 bands reference is?

01:20:45 11 A. I have a guess of what it is. I think
01:20:46 12 PS8 refers to PeopleSoft 8, which was the HR
01:20:51 13 database that we used at the time and it was a
01:20:53 14 version of software. And the title there is a
01:20:56 15 title that's attached to a job code and how it
01:20:58 16 would be displayed in a system.

01:21:00 17 We've consistently kept a distinction
01:21:03 18 between a systems title and a business card title
01:21:06 19 and not trying to control business card titles and
01:21:08 20 let individuals choose what they want, with their
01:21:12 21 leader's discretion.

01:21:26 22 Q. If I could trouble you to please turn to
01:21:28 23 the page that says "A Ranking Tool to Help the
01:21:31 24 Rationale and Clarity."

01:21:35 25 A. Okay.

01:22:04 1 Okay.

01:22:05 2 Q. Okay. Can you describe what's being
01:22:14 3 represented on this page?

01:22:19 4 A. I'm not sure I could describe
01:22:21 5 specifically what this was trying to illustrate.

01:22:26 6 Q. [REDACTED]

01:22:30 7 [REDACTED]

01:22:31 8 Do you see that?

01:22:32 9 A. Yes.

01:22:32 10 Q. [REDACTED]

01:22:35 11 [REDACTED]

01:22:39 12 [REDACTED] [REDACTED]

01:22:42 13 [REDACTED] [REDACTED]

01:22:44 14 Do you see that?

01:22:44 15 A. I do see that.

01:22:45 16 Q. [REDACTED]

01:22:47 17 [REDACTED]

01:22:51 18 A. No. I think from a context perspective,
01:22:53 19 you have to take this page and look at the page
01:22:56 20 prior to it.

01:22:56 21 Q. Sure.

01:22:57 22 A. So the page prior to it is talking about
01:22:59 23 processes or tools to help leaders in evaluating
01:23:03 24 decisions or making decisions. And it's about

01:23:04 25 [REDACTED] [REDACTED]

01:23:07 1

[REDACTED]

01:23:09 2

[REDACTED]

01:23:12 3

[REDACTED]

01:23:12 4

[REDACTED]

01:23:16 5

[REDACTED]

01:23:19 6

[REDACTED]

01:23:22 7

[REDACTED]

01:23:25 8

[REDACTED] [REDACTED]

01:23:28 9

[REDACTED]

01:23:30 10

[REDACTED]

01:23:32 11

This second page we went to first on its

01:23:35 12

own has no context.

01:23:36 13

Q. Looking at the page before where it says

01:23:38 14

"Assess and Calibrate Across Organization," one of

01:23:41 15

the items on this page says, [REDACTED]

01:23:43 16

[REDACTED]

01:23:44 17

Do you see that?

01:23:45 18

A. Yes, I do see that.

01:23:46 19

Q. [REDACTED]

01:23:49 20

[REDACTED]

01:23:53 21

[REDACTED]

01:23:56 22

[REDACTED]

01:23:58 23

A. [REDACTED]

01:23:59 24

[REDACTED]

01:24:01 25

Q. What's your understanding of what that

01:24:03 1 means?

01:24:04 2 A. Like I said, I don't know specifically
01:24:05 3 what it meant here, but the example that you
01:24:08 4 provided would be a likely scenario of things that
01:24:11 5 we would want managers to be looking at. Managers
01:24:16 6 don't have access to all that information. [REDACTED]

01:24:18 7 [REDACTED]

01:24:21 8 [REDACTED] [REDACTED]

01:24:23 9 [REDACTED]

01:24:25 10 [REDACTED]

01:24:26 11 Q. [REDACTED]

01:24:28 12 [REDACTED]

01:24:31 13 [REDACTED]

01:24:34 14 [REDACTED]

01:24:38 15 [REDACTED]

01:24:41 16 A. [REDACTED]

01:24:44 17 Q. How do you train managers to do what
01:24:48 18 item C instructs about evaluating exposure in
01:24:53 19 determining whether it's defensible?

01:24:56 20 A. We train managers to focus on
01:24:58 21 performance and making pay decisions based on
01:25:02 22 performance.

01:25:04 23 Q. And the prior slide which says to

01:25:05 24 [REDACTED]

01:25:08 25 [REDACTED]

01:25:09 1 A. Like I said, I'm not sure what the
01:25:10 2 context was for this on this slide or this page.
01:25:13 3 We train managers to focus on performance and to
01:25:15 4 make their decisions based on performance.

01:25:18 5 Q. [REDACTED]

01:25:20 6 [REDACTED]

01:25:21 7 MR. KIERNAN: Object to form.

01:25:28 8 THE WITNESS: [REDACTED]

01:25:31 9 [REDACTED]

01:25:32 10 [REDACTED]

01:25:36 11 [REDACTED]

01:25:39 12 BY MS. DERMODY:

01:25:40 13 Q. And do you have a training that's
01:25:41 14 focused on managing diversity or diverse people?

01:25:46 15 A. We do.

01:25:46 16 Q. And is part of that training focused on
01:25:49 17 ensuring that there is fairness of treatment
01:25:51 18 across different demographic groups?

01:25:59 19 A. The training focuses on managing
01:26:00 20 diversity, focused on inclusion within the
01:26:03 21 workplace.

01:26:05 22 Q. Is there a training that focuses on
01:26:07 23 paying people that have similar talent and similar
01:26:12 24 performance the same inclusive of different
01:26:14 25 demographic groups?

01:26:15 1 A. We don't have any training that focuses
01:26:17 2 on paying anybody the same. All of our focus on
01:26:20 3 training on compensation is paying for
01:26:22 4 performance, and appropriate pay for the person,
01:26:24 5 the skills they bring, and the contribution that
01:26:26 6 they bring. We specifically train not to focus on
01:26:31 7 internal equity in paying people the same.

01:26:32 8 Q. But assuming that you have two people
01:26:34 9 that have the same skill level and are giving the
01:26:38 10 same performance, is the expectation that their
01:26:41 11 pay would be the same?

01:26:43 12 MR. KIERNAN: Object to form.

01:26:44 13 THE WITNESS: No.

01:26:45 14 BY MS. DERMODY:

01:26:45 15 Q. What would be the distinction between
01:26:47 16 those two people?

01:26:49 17 A. There could be a number of different
01:26:50 18 factors that could drive a distinction. We would
01:26:52 19 expect them to be paid comparably or similarly,
01:26:55 20 but we wouldn't expect them to be paid the same.

01:26:58 21 Q. And what might distinguish them in that
01:27:00 22 hypothetical?

01:27:01 23 A. Could be background and experience,
01:27:04 24 could be prior roles, could be a number of
01:27:06 25 different factors of things that they brought with

01:27:09 1 them to the role that the manager believes drives
01:27:12 2 the different value for them today.

01:27:14 3 Q. So if they -- if one of them had more
01:27:16 4 tenure with the company, more knowledge of the
01:27:20 5 job, for example, that would be a distinction?

01:27:21 6 A. We don't focus on tenure with the
01:27:24 7 company as a factor. So someone might have come
01:27:26 8 in with a different background or different
01:27:28 9 experience an individual manager sees as having a
01:27:31 10 different value. It's the manager's discretion in
01:27:33 11 that case. So not something that the company
01:27:36 12 specifically is looking for that should say they
01:27:39 13 should be paid the same.

01:27:40 14 Q. And if the hypothetical is that the
01:27:43 15 people come in straight out of college, same
01:27:45 16 experience, same performance, would the
01:27:47 17 expectation be that they would be paid the same?

01:27:51 18 MR. KIERNAN: Object to form.

01:27:54 19 THE WITNESS: The -- the one area where
01:27:56 20 we have more consistency in pay is with new grads,
01:28:01 21 because they generally have no work experience.
01:28:02 22 And so fairly typical practice is to pay them
01:28:05 23 roughly the same. It starts to differentiate as
01:28:08 24 they have differences in performance.

01:28:09 25 We don't expect everyone in the same

01:28:11 1 performance rating to get the same merit every
01:28:14 2 year. We expect differentiation inside of that.
01:28:19 3 They would probably be paid similarly but not
01:28:20 4 exactly the same.

01:28:26 5 Done with this one?

01:28:27 6 BY MS. DERMODY:

01:28:28 7 Q. Yes. I know, that was so much fun.
01:28:33 8 We'll probably do better with the numbering.

01:30:00 9 (Whereupon, Deposition Exhibit 2740
01:30:00 10 was marked for identification.)

01:30:14 11 BY MS. DERMODY:

01:30:14 12 Q. Mr. Stubblefield, the document marked as
01:30:17 13 2740 should have a number on the front, INTUIT
01:30:19 14 -52841.

01:30:22 15 Do you see that?

01:30:22 16 A. Yes, I do.

01:30:23 17 Q. If you could turn to the next page,
01:30:25 18 there's a title page. And feel free to look
01:30:31 19 through the document.

01:30:32 20 Do you recognize seeing this before?

01:30:33 21 A. Yes, I do.

01:30:34 22 Q. Okay. Was this training that you
01:30:37 23 attended?

01:30:40 24 A. Yes.

01:30:41 25 Q. And did you participate in creating the

01:30:43 1 content for this document?

01:30:46 2 A. Yes, I did.

01:30:49 3 Q. And what was your role?

01:30:52 4 A. I would have contributed to different
01:30:54 5 portions of it. So just based on the
01:30:57 6 responsibility I had for the focal decision
01:30:58 7 process, I would have contributed to some of this,
01:31:01 8 some of the content.

01:31:03 9 Q. Okay.

01:31:07 10 A. I also would have presented the content.

01:31:11 11 Q. And who would have received this
01:31:13 12 training?

01:31:15 13 A. This was specifically focused on level 2
01:31:16 14 and level 3 leaders, managers within the
01:31:19 15 organization.

01:31:21 16 Q. And for someone who is not versed in the
01:31:25 17 Intuit vocabulary, what does that mean?

01:31:27 18 A. In this context, level 1 is the CEO,
01:31:31 19 level 2 is his direct reports, level 3 is their
01:31:34 20 direct reports.

01:31:45 21 Q. So at this time, were you considered a
01:31:47 22 level 3 manager?

01:31:51 23 A. No. At this time I would have been
01:31:53 24 level 4 within the organization.

01:31:55 25 Q. So is Mr. Grenier a level 3 at this

01:31:58 1 time?

01:31:59 2 A. Yes.

01:32:14 3 Q. If you turn to page 15 of the document,
01:32:19 4 it should have a caption at the top that says, "6
01:32:22 5 Steps In Making an Effective Pay Decision."

01:32:25 6 Do you see that?

01:32:25 7 A. Yes.

01:32:27 8 Q. [REDACTED]

01:32:31 9 Do you see that?

01:32:31 10 A. [REDACTED]

01:32:36 11 Q. And it gives a set of examples.

01:32:38 12 [REDACTED]

01:32:41 13 [REDACTED]

01:32:45 14 [REDACTED]

01:32:49 15 [REDACTED]

01:32:50 16 Do you see that?

01:32:51 17 A. Yes.

01:32:51 18 Q. What are internal relativities?

01:32:54 19 A. In this case, I think it would be them
01:32:56 20 looking at the pay of their own team, so how they
01:32:59 21 pay other individuals.

01:33:04 22 Q. And for what purpose would that be?

01:33:06 23 A. Piece of data. It's an input. Like the
01:33:11 24 others, [REDACTED]

01:33:13 25 [REDACTED]

01:33:15 1

01:33:18 2

01:33:20 3

01:33:22 4

Q. Would that be akin to an internal benchmark?

01:33:23 5

01:33:27 6

A. Benchmark is probably broad. It's a data point.

01:33:34 7

01:33:37 8

Q.

do you see that?

01:33:39 9

A. Yes.

01:33:39 10

01:33:41 11

01:33:43 12

01:33:44 13

Do you see that?

01:33:44 14

A. I do see that.

01:33:45 15

Q. And what does that mean?

01:33:49 16

01:33:51 17

01:33:53 18

01:33:56 19

01:33:59 20

01:34:02 21

A. I think it refers back to the page we were -- two pages we were looking at on the other document on the calibration process, looking at employees and calibrating across decisions with the intent to recognize that we're paying for performance.

01:34:03 22

01:34:05 23

01:34:09 24

Q. And by "calibrating decisions," does that mean that you're linking equivalent performance to similar pay decisions?

01:34:20 25

A. No. It's looking to make sure there's

01:34:22 1 alignment between performance and pay decisions.

01:34:25 2 It's not trying to get to the same decisions.

01:34:27 3 Q. Okay. What is pay equity as referenced
01:34:31 4 here?

01:34:31 5 A. It's looking for that -- I think it's
01:34:33 6 looking for that relationship between pay and
01:34:36 7 performance in that your highest performing
01:34:38 8 employee should likely be one of your highest paid
01:34:42 9 employees.

01:34:46 10 Q. And what was the ranking process that
01:34:49 11 happened?

01:34:51 12 A. I couldn't say specifically what
01:34:53 13 processes were used. If you go back to the other
01:34:55 14 document [REDACTED]

01:34:57 15 [REDACTED]

01:35:00 16 [REDACTED]

01:35:02 17 [REDACTED]

01:35:04 18 [REDACTED]

01:35:07 19 Q. Can you tell me which document you're
01:35:08 20 talking about?

01:35:09 21 A. Sorry. That was the one that's labeled
01:35:11 22 2739.

01:35:31 23 Q. Oh, the page that had those boxes?

01:35:35 24 A. Yes.

01:35:35 25 Q. So you're looking at before what was

01:35:37 1 called [REDACTED]

01:35:40 2 [REDACTED]

01:35:41 3

A. [REDACTED]

01:35:42 4 [REDACTED]

01:35:53 5 MR. KIERNAN: Kelly, if it's helpful,
01:35:55 6 it's also in this -- it's also in the current
01:35:58 7 exhibit.

01:35:59 8 MS. DERMODY: Oh, please tell me where.
01:36:00 9 That would be much --

01:36:02 10 MR. KIERNAN: 2740. And it has page
01:36:03 11 numbers. So it's page 20 and 21.

01:36:10 12 MS. DERMODY: Bless you, Mr. Kiernan.

01:36:16 13 MR. KIERNAN: I don't want to go back to
01:36:18 14 that other document because of the length.

01:36:20 15 MS. DERMODY: Yes. Yes. Hard to use.
01:36:21 16 Great.

01:36:22 17 Q. So in Exhibit 2740 on page 21, is this
01:36:27 18 the chart that you were referencing?

01:36:33 19 A. Yes.

01:36:33 20 Q. [REDACTED]

01:36:35 21 [REDACTED]

01:36:41 22 A. This was intended to be -- there's a

01:36:43 23 [REDACTED]

01:36:45 24 [REDACTED]

01:36:47 25 [REDACTED]

01:36:49 1

[REDACTED]

01:36:53 2

[REDACTED]

01:36:55 3

[REDACTED]

01:37:03 4

Q.

[REDACTED]

01:37:07 5

[REDACTED]

01:37:13 6

[REDACTED]

01:37:18 7

[REDACTED]

01:37:21 8

[REDACTED]

01:37:24 9

A. If I understand your question, [REDACTED]

01:37:25 10

[REDACTED]

01:37:28 11

[REDACTED] Yeah.

01:37:30 12

Q. Okay. If you turn to page 23, there's a

01:37:44 13

page that's called "Actions that Raise Eyebrows."

01:37:48 14

A. Yes.

01:37:50 15

Q. And it says in the very first bullet,

01:37:51 16

[REDACTED]

01:37:55 17

[REDACTED]

01:37:56 18

Do you see that?

01:37:56 19

A. Yes.

01:37:56 20

Q. And what is your understanding of what

01:37:58 21

that means?

01:38:02 22

A. As managers are making decisions in this

01:38:04 23

process, there's -- there's a number of decisions

01:38:06 24

that they can make.

01:38:08 25

We provide guidelines or recommendations

01:38:10 1 of what merit increases would look like for
01:38:12 2 different levels of performance. [REDACTED]

01:38:15 3 [REDACTED]

01:38:17 4 [REDACTED] [REDACTED] [REDACTED]

01:38:20 5 [REDACTED] [REDACTED]

01:38:23 6 [REDACTED]

01:38:25 7 [REDACTED]

01:38:28 8 [REDACTED]

01:38:30 9 [REDACTED]

01:38:33 10 The [REDACTED] refers to a couple
01:38:35 11 of things in that it -- during this time period,

01:38:40 12 [REDACTED]

01:38:41 13 [REDACTED]

01:38:45 14 [REDACTED] [REDACTED]

01:38:48 15 [REDACTED] [REDACTED]

01:38:50 16 [REDACTED]

01:38:53 17 [REDACTED] [REDACTED]

01:38:55 18 [REDACTED].

01:38:56 19 It's also probably looking at just kind

01:39:00 20 [REDACTED]

01:39:02 21 [REDACTED]

01:39:04 22 [REDACTED]

01:39:07 23 [REDACTED]

01:39:09 24 [REDACTED]

01:39:11 25 Q. Okay. On page 33, there is a caption at

01:39:19 1 the top, "A Reminder...Role of Manager - New
01:39:22 2 Hires."

01:39:23 3 Do you see that?

01:39:24 4 A. Yes. Yes.

01:39:26 5 Q. And then it says under the first --
01:39:30 6 under the bullet, [REDACTED]

01:39:34 7 [REDACTED]

01:39:36 8 [REDACTED]

01:39:38 9 [REDACTED]

01:39:41 10 [REDACTED]

01:39:42 11 A. Yes.

01:39:42 12 Q. Do you see that?

01:39:43 13 A. Yes.

01:39:43 14 Q. And what is this about? Do you know?

01:39:46 15 A. [REDACTED]

01:39:48 16 [REDACTED]

01:39:51 17 [REDACTED]

01:39:53 18 [REDACTED]

01:39:55 19 [REDACTED]

01:39:58 20 [REDACTED]

01:40:01 21 We looked in one of the exhibits earlier
01:40:04 22 of the [REDACTED] [REDACTED]

01:40:07 23 [REDACTED]

01:40:10 24 [REDACTED]

01:40:12 25 [REDACTED]

01:41:31 1 Do you see that?

01:41:31 2 A. Yes.

01:41:32 3 Q. And where do those status items come
01:41:36 4 from? Who was the decision maker?

01:41:39 5 A. It's -- it's a status from a process
01:41:42 6 perspective, not from a decision perspective. So
01:41:45 7 this whole section of material was training
01:41:48 8 material on using the system. And this is trying
01:41:51 9 to help managers understand how to navigate within
01:41:55 10 the system.

01:41:56 11 Where you see the statuses labeled, over
01:41:59 12 on the far left column, you'll also see a thing, a
01:42:01 13 label. [REDACTED]

01:42:04 14 [REDACTED] [REDACTED]

01:42:08 15 [REDACTED]

01:42:11 16 [REDACTED]

01:42:13 17 "[REDACTED]

01:42:16 18 [REDACTED]. [REDACTED]

01:42:19 19 [REDACTED]

01:42:21 20 [REDACTED]

01:42:24 21 [REDACTED]

01:42:27 22 [REDACTED]

01:42:29 23 [REDACTED]

01:42:31 24 [REDACTED].

01:42:36 25 Q. And then let's just take an example

01:42:38 1 here. Blue Sky is one of the -- the names listed.

01:42:45 2 [REDACTED]

01:42:47 3 [REDACTED]

01:42:52 4 [REDACTED] [REDACTED]

01:42:57 5 [REDACTED]

01:43:00 6 [REDACTED]

01:43:02 7 A. [REDACTED]

01:43:03 8 [REDACTED] [REDACTED]

01:43:05 9 [REDACTED]

01:43:08 10 [REDACTED] And this is just made up data

01:43:14 11 that we use for training purposes. This is not

01:43:16 12 real data.

01:43:18 13 Q. There isn't a Blue Sky?

01:43:20 14 A. There might be. But all the numbers,

01:43:22 15 everything else is just made up for demonstration

01:43:26 16 purposes.

01:43:27 17 Q. Okay. If you turn to 45, please.

01:43:43 18 A. Mh-hmm.

01:43:50 19 Q. It should say, "Recommend a Merit

01:43:51 20 Increase - Salaried Employee."

01:43:54 21 Do you see that?

01:43:55 22 A. Yes.

01:43:55 23 Q. [REDACTED]

01:43:57 24 [REDACTED]

01:44:01 25 [REDACTED]

01:44:02 1

A.

01:44:04 2

01:44:07 3

01:44:10 4

Q.

01:44:14 5

01:44:18 6

01:44:23 7

Do you see that?

01:44:24 8

A.

Yes.

01:44:24 9

Q.

01:44:26 10

01:44:32 11

A.

01:44:35 12

01:44:37 13

Q.

01:44:39 14

01:44:46 15

A.

01:44:48 16

01:44:49 17

01:44:52 18

01:44:55 19

01:44:57 20

01:45:00 21

01:45:03 22

01:45:05 23

01:45:07 24

01:45:10 25

01:46:42 1 Q. What does that mean?

01:46:43 2 A. [REDACTED]

01:46:45 3 [REDACTED] [REDACTED]

01:46:47 4 [REDACTED]

01:46:49 5 [REDACTED]

01:46:51 6 [REDACTED]

01:46:53 7 [REDACTED]

01:46:55 8 [REDACTED]

01:46:59 9 [REDACTED]

01:47:00 10 Q. [REDACTED]

01:47:05 11 [REDACTED]

01:47:08 12 [REDACTED]

01:47:11 13 [REDACTED]

01:47:15 14 [REDACTED]

01:47:16 15 A. [REDACTED]

01:47:18 16 Q. Okay.

01:47:18 17 A. Yes.

01:47:20 18 Q. So [REDACTED]

01:47:22 19 [REDACTED]

01:47:24 20 A. [REDACTED]

01:47:27 21 [REDACTED]

01:47:29 22 [REDACTED]

01:47:30 23 [REDACTED]

01:47:33 24 [REDACTED]

01:47:35 25 [REDACTED]

01:47:37 1

01:47:40 2

01:47:42 3

01:47:42 4

Q. Okay. And if you could please go to 64.

01:47:52 5

It should say "Stock Tool - Recommend Options."

01:47:55 6

Do you see that?

01:47:55 7

A. Yes.

01:47:56 8

Q. And then it has on the right side,

01:47:58 9

01:48:02 10

I guess drop downs.

01:48:08 11

Do you see that?

01:48:08 12

A. Yes.

01:48:09 13

Q.

01:48:10 14

01:48:13 15

01:48:18 16

01:48:21 17

01:48:22 18

A.

01:48:25 19

01:48:28 20

One of the challenges

01:48:30 21

we had in the organization was we have employees

01:48:32 22

that get promoted during the year. When they get

01:48:35 23

promoted and they move into a new-level job,

01:48:38 24

sometimes their -- most times their performance

01:48:40 25

changes. They might have been outstanding before.

01:48:43 1 Now they are strong. [REDACTED]

01:48:44 2 [REDACTED] [REDACTED]

01:48:46 3 [REDACTED]

01:48:48 4 [REDACTED]

01:48:52 5 [REDACTED]

01:48:55 6 Q. Okay.

01:48:55 7 (Whereupon, Deposition Exhibit 2741

01:48:55 8 was marked for identification.)

01:49:28 9 BY MS. DERMODY:

01:49:29 10 Q. Mr. Stubblefield, the document marked as

01:49:32 11 2741 should have that Intuit number -53146.

01:49:36 12 Do you see that?

01:49:37 13 A. Yes, I do.

01:49:39 14 Q. And is this an e-mail to you from -- is

01:49:42 15 it Ms. Grafil?

01:49:43 16 A. Yes.

01:49:48 17 Q. And do you recall there being a

01:49:51 18 discussion with Ms. Grafil about competitive

01:49:53 19 salary for strategy positions?

01:49:58 20 A. I don't recall a specific conversation.

01:50:01 21 Q. If you look through the document, does

01:50:03 22 it refresh your recollection about this exchange

01:50:07 23 you were having with her?

01:50:15 24 A. This was seven years ago. I don't

01:50:18 25 recall the specific conversation.

01:50:25 1 Q. Do you have an understanding of what the
01:50:27 2 attachments are reflecting?

01:50:33 3 A. It's reflecting two things. So on the
01:50:37 4 what I guess I would think of as page 2 in this,
01:50:40 5 so the page that says, "Intuit strategy
01:50:43 6 positions," this is a list of the positions that
01:50:46 7 Intuit had for those roles.

01:50:48 8 So the titles, the job codes listed next
01:50:50 9 to those, the salary range guidelines, this is
01:50:53 10 really not a salary range guideline. It's the
01:50:56 11 market reference data. Intuit does not have
01:50:58 12 salary ranges. [REDACTED]

01:51:01 13 [REDACTED]

01:51:03 14 [REDACTED]

01:51:05 15 [REDACTED]

01:51:08 16 [REDACTED]

01:51:11 17 [REDACTED]

01:51:13 18 [REDACTED]

01:51:14 19 [REDACTED]

01:51:16 20 [REDACTED]

01:51:18 21 The third page is some data that she had
01:51:21 22 collected from outside conversations with her
01:51:24 23 recruiting firm on how some of the organizations
01:51:26 24 that we might be recruiting from were paying
01:51:29 25 similar positions.

01:55:06 1 the cover page INTUIT -54116.

01:55:10 2 Do you see that?

01:55:10 3 A. Yes.

01:55:13 4 Q. And if you look through this document,
01:55:14 5 do you recognize what this is?

01:55:17 6 A. Yes.

01:55:18 7 Q. And what is this?

01:55:20 8 A. [REDACTED]

01:55:22 9 [REDACTED]

01:55:24 10 Q. Similar to what we've looked at before?

01:55:26 11 A. Similar to what we've looked at before,
01:55:28 12 this is specific to fiscal year '7.

01:55:30 13 Q. Okay. [REDACTED]

01:55:32 14 [REDACTED]

01:55:33 15 A. [REDACTED]

01:55:33 16 (Whereupon, Deposition Exhibit 2743

01:55:33 17 was marked for identification.)

01:56:37 18 BY MS. DERMODY:

01:56:37 19 Q. Mr. Stubblefield, the document marked as
01:56:39 20 2743 should have INTUIT -41933 in the front.

01:56:43 21 Do you see that?

01:56:44 22 A. Yes.

01:56:47 23 Q. Is this an e-mail from Ms. Hall to
01:56:50 24 several people CC'ing you?

01:56:53 25 A. Yes.

01:56:57 1 Q. And do you recall having a discussion
01:56:58 2 about the program manager job family?

01:57:09 3 A. Yes.

01:57:09 4 Q. And what was that about?

01:57:16 5 A. [REDACTED]

01:57:18 6 [REDACTED]

01:57:20 7 [REDACTED]

01:57:22 8 [REDACTED]

01:57:25 9 [REDACTED]

01:57:37 10 Q. [REDACTED]

01:57:39 11 [REDACTED]

01:57:42 12 [REDACTED]

01:57:47 13 [REDACTED]

01:57:49 14 [REDACTED]

01:57:52 15 [REDACTED]

01:57:53 16 [REDACTED]

01:57:55 17 [REDACTED]

01:57:56 18 [REDACTED]

01:57:57 19 [REDACTED]

01:57:58 20 [REDACTED]

01:58:01 21 Do you see that?

01:58:02 22 A. Yes.

01:58:02 23 Q. [REDACTED]

01:58:05 24 [REDACTED]

01:58:11 25 [REDACTED]

01:58:15 1

[REDACTED]

01:58:17 2

MR. KIERNAN: Object to form.

01:58:18 3

THE WITNESS: Sorry.

01:58:19 4

No.

01:58:19 5

BY MS. DERMODY:

01:58:20 6

Q. What was this?

01:58:26 7

A. [REDACTED] and pay

01:58:29 8

[REDACTED]

01:58:31 9

[REDACTED]

01:58:34 10

[REDACTED]

01:58:36 11

[REDACTED]

01:58:38 12

[REDACTED]

01:58:40 13

[REDACTED].

01:58:42 14

[REDACTED]

01:58:46 15

[REDACTED]

01:58:48 16

[REDACTED]

01:58:51 17

[REDACTED]

01:58:52 18

[REDACTED]

01:58:54 19

[REDACTED]

01:58:56 20

[REDACTED] [REDACTED]

01:58:59 21

[REDACTED]

01:59:01 22

[REDACTED]

01:59:04 23

[REDACTED]

01:59:06 24

[REDACTED]

01:59:08 25

[REDACTED]

01:59:34 1 Q. On the same first page here, there is a
01:59:38 2 bold statement, "Some important points," and the
01:59:41 3 second of these is "PD vs. non-PD jobs."

01:59:46 4 Do you see that?

01:59:46 5 A. Yes.

01:59:47 6 Q. And what are -- what are PD versus
01:59:49 7 non-PD?

01:59:50 8 A. What I was just trying to describe,
01:59:52 9 product development versus non-product
01:59:54 10 development.

01:59:55 11 Q. And the second bullet says, [REDACTED]

01:59:57 12 [REDACTED]

02:00:00 13 [REDACTED]

02:00:02 14 Do you see that?

02:00:02 15 A. Yes.

02:00:03 16 Q. And what does that mean?

02:00:04 17 A. [REDACTED]

02:00:07 18 [REDACTED] [REDACTED]

02:00:10 19 [REDACTED]

02:00:13 20 [REDACTED]

02:00:15 21 [REDACTED]

02:00:15 22 [REDACTED]

02:00:18 23 [REDACTED]

02:00:20 24 [REDACTED] [REDACTED]

02:00:23 25 [REDACTED]

02:00:25 1

02:00:27 2

02:00:30 3

02:00:32 4

Q. Got it.

02:00:38 5

02:00:40 6

We've been going about an hour. Should we take a break?

02:00:41 7

MR. KIERNAN: Oh, yeah. Time flies.

02:00:44 8

02:00:45 9

02:00:48 10

THE VIDEOGRAPHER: This is the end of Video Number 3. The time is 2:00 p.m. We are going off the record.

02:01:00 11

(Whereupon, a recess was taken.)

02:01:00 12

02:01:00 13

(Whereupon, Deposition Exhibit 2744 was marked for identification.)

02:20:04 14

02:20:05 15

02:20:08 16

02:20:12 17

THE VIDEOGRAPHER: This is the beginning of Video Number 4 in the deposition of Mason Stubblefield. The time is 2:20 p.m. We're back on the record.

02:20:15 18

BY MS. DERMODY:

02:20:15 19

02:20:19 20

Q. And did the witness get passed 5 -- 2744.

02:20:21 21

A. Yes.

02:20:22 22

02:20:24 23

Q. That should be in front of you. Let me pass these.

02:20:29 24

02:20:30 25

Mr. Stubblefield, this document that was marked as Exhibit 2744 should have that Intuit

02:20:33 1 number on the front, 52826.

02:20:36 2 Do you see that?

02:20:36 3 A. Yes, I do.

02:20:38 4 Q. And if you turn to the next page, which
02:20:39 5 is the caption page of this document, your name is
02:20:45 6 in the middle of it.

02:20:46 7 A. Yes.

02:20:47 8 Q. Is this a document that you prepared?

02:20:49 9 A. Yes, it is.

02:20:50 10 Q. And who was this prepared for?

02:20:54 11 A. This was prepared for our talent
02:20:56 12 acquisition team.

02:20:59 13 Q. And was that the recruiting group?

02:21:01 14 A. Yes.

02:21:02 15 Q. Okay. And what was the purpose of this
02:21:06 16 presentation?

02:21:09 17 A. This was trying to help them in ways we
02:21:15 18 wanted them to think about decisions that they
02:21:18 19 make as they were helping managers bring talent
02:21:20 20 into the organization from a rewards perspective.

02:21:24 21 Q. If you turn to page 3 of this
02:21:26 22 document --

02:21:27 23 A. Yes.

02:21:27 24 Q. -- it says at the top "INTU Benchmark
02:21:31 25 Levels: Purpose."

02:21:33 1 Do you see that?

02:21:34 2 A. Yes.

02:21:34 3 Q. And what was the INTU benchmark level?

02:21:40 4 Was that, again, the external market or is it
02:21:42 5 something else here?

02:21:44 6 A. This is internal. So INTU is our stock
02:21:46 7 symbol. Working in equity comp, I tend to
02:21:47 8 abbreviate Intuit in the stock symbol instead of
02:21:50 9 writing it out. So this is a reference to Intuit.

02:21:53 10

02:21:56 11 [REDACTED] We talked earlier about job architecture
02:21:59 12 in the levels that we used. This was trying to
02:22:01 13 help them get grounded in the way those levels
02:22:04 14 were built and the purpose of the levels.

02:22:08 15 Q. And the third bullet, which says

02:22:10 16

02:22:14 17

02:22:15 18 A. Yes.

02:22:15 19 Q. What is that describing here?

02:22:17 20

02:22:20 21

02:22:24 22

02:22:27 23

02:22:31 24

02:22:33 25

02:22:35 1

[REDACTED]

02:22:37 2

[REDACTED]

02:22:44 3

Q. If you turn to the next page, page 4 --

02:22:46 4

A. Yes.

02:22:46 5

Q. -- which says "INTU Benchmark Levels" at

02:22:50 6

the top.

02:22:55 7

[REDACTED]

02:22:58 8

[REDACTED]

02:23:00 9

[REDACTED].

02:23:04 10

Can you describe what this is?

02:23:05 11

A.

[REDACTED]

02:23:07 12

[REDACTED]

02:23:10 13

[REDACTED]

02:23:13 14

[REDACTED]

02:23:16 15

[REDACTED]

02:23:18 16

[REDACTED]

02:23:20 17

[REDACTED]

02:23:22 18

[REDACTED]

02:23:24 19

[REDACTED]

02:23:27 20

[REDACTED]

02:23:29 21

[REDACTED]

02:23:30 22

Q. And was this, again, for equity

02:23:34 23

determinations?

02:23:36 24

A. Equity meaning what?

02:23:37 25

Q. Stock.

02:23:38 1 A. No.

02:23:39 2 Q. This is for everything?

02:23:40 3 A. This was for job leveling purposes and
02:23:45 4 it did not -- levels didn't tie -- levels don't
02:23:50 5 tie directly to compensation, [REDACTED]

02:23:52 6 [REDACTED]
02:23:55 7 [REDACTED] It's a tool to
02:23:58 8 help us match our jobs to the market more
02:24:00 9 effectively.

02:24:00 10 So our levels are similar to, mapped,
02:24:05 11 easily mapped to survey job levels so that when we
02:24:08 12 pull market reference data in, we know we're
02:24:11 13 looking at like jobs.

02:24:13 14 Q. The fourth bullet on the same page says

02:24:14 15 [REDACTED]

02:24:18 16 Do you see that?

02:24:19 17 A. Yes. Yes.

02:24:19 18 Q. And what does that mean?

02:24:20 19 A. [REDACTED]

02:24:23 20 [REDACTED]

02:24:25 21 [REDACTED]

02:24:28 22 [REDACTED] [REDACTED]

02:24:32 23 [REDACTED]

02:24:34 24 [REDACTED]

02:24:37 25 [REDACTED]

02:24:40 1

[REDACTED]

02:24:45 2

(Whereupon, Deposition Exhibit 2745

02:24:45 3

was marked for identification.)

02:25:10 4

BY MS. DERMODY:

02:25:17 5

Q. The document marked as 2745 should have

02:25:19 6

that number on the front -50015.

02:25:22 7

Do you see that?

02:25:23 8

A. I do.

02:25:26 9

Q. If you open this document to the first

02:25:27 10

page, it has the title page and the next page has

02:25:31 11

a date on it.

02:25:33 12

Do you see those pages?

02:25:34 13

A. Yes, I do.

02:25:36 14

Q. And is this a document that you recall

02:25:39 15

seeing?

02:25:43 16

A. Yes, it is.

02:25:44 17

Q. And would this have been a document that

02:25:46 18

was produced in part in your area at this time?

02:25:52 19

A. Yes, it is.

02:25:57 20

Q. And was this a training for managers?

02:26:03 21

A. It would have been for training probably

02:26:04 22

for managers and maybe for HR business partners.

02:26:08 23

Q. Okay. If you turn to -- oh, dear, it's

02:26:14 24

another one of these documents without page

02:26:16 25

numbers. If you turn about midway through the

